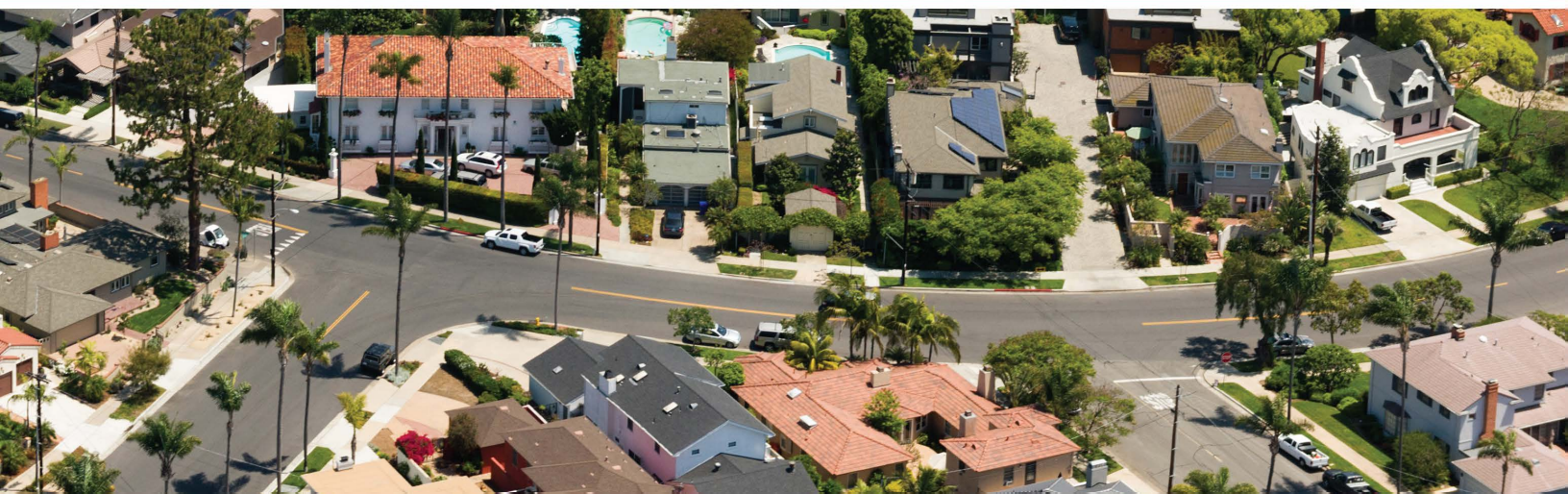




Appendix B: Affirmatively Furthering Fair Housing (AFFH)



Appendix B- Affirmatively Furthering Fair Housing (AFFH)

Assembly Bill 686 (AB 686), passed in 2018, requires cities and counties to administer programs and activities related to housing and community development in a manner that affirmatively furthers fair housing and does not take any action that is materially inconsistent with this obligation. AB 686 defined “affirmatively further fair housing” as “taking meaningful actions, in addition to combating discrimination, to overcome segregation patterns and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes.

AB 686 requires that all housing elements prepared on or after January 1, 2021, include a program with the following:

- An assessment of fair housing within the jurisdiction that includes the following components: a summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities; an assessment of contributing factors; and an identification of fair housing goals and actions.
- Affirmatively Further Fair Housing as part of achieving the goals and objectives.
- The Sites Inventory in all housing elements incorporate affirmatively furthering fair housing.

In May 2020, San Diego County (County) and the San Diego Regional Alliance for Fair Housing (SDRAFH) adopted the Regional Analysis of Impediments to Fair Housing Choice for FY 2020-25 (SDC 2020-25 AI). The SDRAFH is a coalition of fair housing organizations, community-based groups, concerned citizens, housing industry representatives, and government agencies working toward affirmatively furthering fair housing. The SDC 2020-25 AI assesses the extent of fair housing issues among specific groups and evaluates the availability of a range of housing choices for all residents. In addition, the SDC 2020-25 AI analyzes the private and public market conditions that may limit the range of housing choices or impede a person’s access to housing. It should be noted that this **Appendix B: Affirmatively Furthering Fair Housing**, will discuss the findings of the SDC 2020-25 AI to complement the findings of this 6th Cycle Housing Element Update.

The City’s objective is to promote and affirmatively further fair housing opportunities throughout the community for all people regardless of age, race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, and genetic information.

It should be noted that some of the statistics referenced in this **Appendix B** might differ from those in **Section 2: Community Profile**, of the Housing Element. The data in the Community Profile was largely obtained from the San Diego Association of Governments (SANDAG) reporting for each community that has been pre-certified by the California Department of Housing and Community Development (HCD). However, additional data research and analysis beyond these parameters of the pre-certified data was required for this **Appendix B**. Therefore, the data utilized in several portions of this **Appendix B** may incorporate data that is more current than that contained in the pre-certified data.

A. Outreach

As discussed in **Appendix C: Community Engagement**, the City has conducted public outreach activities for the update of the 6th Cycle Housing Element that included presentations, a City Council Study Session, Community Workshops, digital media, social media, numerous mailers, advertisements, and noticed Public Hearings. The City also contacted key stakeholders including local affordable housing properties, organizations, and developers, as well as social justice advocates, veteran groups, and organizations dedicated to addressing homelessness. Outreach efforts are summarized below and in detail in **Appendix C: Community Engagement**.

The City of Coronado (City or Coronado) has completed the following outreach and analysis to inform the Housing Element and all housing goals, policies, and programs to meet the housing requirements of the State of California (State or California):

1. Regional Analysis of Impediments

Before the preparation of the 6th Cycle Housing Element, the County and SDRAFH collaborated on the development of the SDC 2020-25 AI. As part of this process, the County and SDRAFH held six community workshops in different communities throughout the County in October and November 2019. The workshops allowed the County and SDRAFH to gather input on the fair housing issues affecting residents in the region. Key issues identified by attendees range from experiencing housing discrimination to the need for improved services. In addition, the County and SDRAFH interviewed key stakeholders and discussed the challenges of building community awareness of fair housing issues and opportunities to improve outreach and promotion of fair housing services. Residents throughout the County were also surveyed to learn more about fair housing issues in each jurisdiction, and Coronado's results indicated that respondents do experience housing discrimination and identified property owners/managers as the source of discrimination.

2. Housing Element Update Website

The City developed a website for public consumption. The website provides relevant information about the 6th Cycle Housing Element update process, such as key features of the housing element, project timeline, and a calendar of events for outreach activities. The website also provided a link to the community survey and the contact information of city staff for residents and stakeholders to send additional comments or request additional information. The Housing Element Update website is located at commentcoronado.org/housing-element-update and is consistently updated as new updates become available.

3. Community Survey

As part of its 6th Cycle Housing Element outreach efforts, the City released a web-based survey that was available on the City's Housing Element page (<https://www.coronado.ca.us/264/Housing-Element-Update>) from October 14, 2020 to November 23, 2020 (Community Survey). The Community Survey included a series of multiple choice and free response questions; of the total 117 webpage visitors, the Community Survey was completed by a total of 37 participants. The purpose of the Community Survey was to gather input on the 6th Cycle Housing Element's potential programs, policies, and housing opportunities in the City. As such, the Community Survey was an important component of the community outreach process. It provided community members and stakeholders who could not participate in other outreach efforts with the ability to provide input on the preparation of the 6th Cycle Housing Element. **Table 1. Community Comment Themes** provides a summary of the feedback received from all public outreach activities (including the Community Survey) as of the date of this document, categorized by general themes.

4. Community Workshops

The City conducted a community workshop on October 22, 2020, that was advertised using flyers, social media notices, and the City's website. Due to the ongoing COVID-19 pandemic, the workshop was held virtually on Zoom to maintain health and safety, while facilitating attendance for residents who would typically be too busy to attend.

The virtual workshop had 36 participants and provided them with an overview of the planning process, the City's Regional Housing Needs Assessment (RHNA) obligations and engaged in an interactive live polling exercise to gather participant feedback and ideas. The workshop recording is available on the Housing Element Update webpage (<https://commentcoronado.org/housing-element-update>) and the workshop presentation can be found in **Appendix A** of this Housing Element. The City will hold an additional community workshop on October 12, 2023. This section of the housing element will be updated after that time to incorporate the findings and feedback from workshop participants. **Table 1. Community Comment Themes** provides a summary of the feedback received from all public outreach activities (including community workshops) as of the date of this document, categorized by general themes.

5. City Council Study Session

The City's outreach efforts also included a City Council Study Session on February 16th, 2021, to engage the City's decision-makers on the selection of opportunity sites. During the Study Session, the Councilmembers identified sites they were both opposed to and in favor of including in the 6th Cycle Sites Inventory. The Council voted to direct staff to move forward with the recommended Sites Inventory summary, as it was presented. The Study Session was open to the public and two residents provided public comments. The adopted minutes and meeting recording are available on the City's website (https://www.coronado.ca.us/government/city_council/agendas_and_minutes). **Table 1. Community Comment Themes** provides a summary of the feedback received from all public outreach activities (including the City Council Study Session) as of the date of this document, categorized by general themes.

6. Stakeholder Meetings

The City made efforts to engage local developers, service providers, community organizations, and advocacy groups to determine needs, challenges, and opportunities related to housing in the City. The City invited a total of 15 groups to participate. A full listing of these groups can be found in **Appendix A: Public Engagement Section** of the Housing Element. Of the 15 groups invited to participate, the City was able to meet with Christ Church, Arete Development (an affordable housing developer active in the City of San Diego area), and Coastal Development Group (CDG). Stakeholder meetings with these community organizations and developers were held on September 25 and September 28, respectively. The input received on the September 25 and 28 meetings includes the following:

CDG was supportive of the Opportunity Sites, expressing there was significant redevelopment potential, specifically identifying Opportunity Sites 6 and 7 as having phenomenal redevelopment potential. CDG did identify the current parking requirements (two spaces/unit) as a possible constraint on Opportunity Sites 2 and 9. CDG referenced the zero-parking project in the North Park area of the City of San Diego. The developer could not lease apartments due to the lack of any dedicated parking and ended up leasing parking spaces from a nearby parking facility in order to successfully lease the units. CDG stated that housing is not marketable or desirable without some parking and this project in North Park is evidence of this fact.

Input received during the stakeholder meeting with Christ Church and Arete Development included the following:

- There is a need for more affordable housing options in the City, with an emphasis on senior and workforce housing for first responders (police, fire), seniors (very low, low income on social security and tourism workers).
- Focus on low to moderate income units.
- Short term rentals are a concern and the percentage of housing that are second homes. The City could look at a potential tax on second or vacant homes and use for affordable housing.
- Trend of multifamily zoned lots redeveloped with one large single-family home.
- Community comments indicated opposition to affordable housing on property across street from Christ Church.

- The City should allow mixed use housing. Christ Church would like to develop affordable housing on their property but retain the thrift shop at church and preschool.
- Community education about what affordable housing really means and recent State laws that apply to all jurisdictions is needed.
- Recommended ADU policies – allow new ADUs on all new residential.
- Creative solutions – subsidies for the cost of tuck under parking (like in Imperial Beach) and pursue grants for the cost of parking.
- Develop smaller square footage units but with livability.
- Support for City pilot program to provide free door to door shuttle for 6 months.
- Constraints to affordable housing development include availability of land, lot size, land costs, density, and height limits. Parking requirements were discussed and a parking requirement of one space/unit was suggested.

Opportunities to mitigate these constraints may be found in increasing outreach on and incentivizing the development of accessory dwelling units (ADUs), increasing the use of mixed-use zoning, streamlining entitlements, increasing density and height limits for affordable housing developments, and providing parking concessions for affordable housing developments.

In order to mitigate constraints and address the input received, the following programs are included in **Section 8: Housing Plan**:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.F:** Funding to Support Fair Housing
- **Program H-3.G:** Analysis of Impediments to Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations
- **Program H-4.A:** Carriage House Program
- **Program H-5.A:** Streamline Process

It should be noted that the City was able to review the opportunity sites listed in the Sites Inventory section with one of the developers participating in the stakeholder meetings, Coastal Development Group (CDG). **Table 1. Community Comment Themes** provides a summary of the feedback received from all public outreach activities (including the stakeholder meetings) as of the date of this document, categorized by general themes.

7. Public Review Draft

Pursuant to state law, the City published the first draft on March 17, 2021, and made it available for public comment for 30 days. Following the 30-day review period, the City received nearly 150 public comments and several petitions with over 200 signatures opposing the City's inventory of sites for affordable housing development. The Revised Draft Housing Element Update was released for public review on October 6, 2023. The required public review period provides residents with an additional opportunity to engage with the Housing Element update process through the provision of comments, as well as an opportunity to hold the City accountable for incorporating previous comments. The Public Review Draft is available for download, review, and comment on the Housing Element Update webpage (<https://www.projectcoronado.org/housing-element-update>). **Table 1. Community Comment Themes** provides a summary of the feedback received from all public outreach activities as of the date of this document (including public comments received by City staff), categorized by general themes.

8. Summary of Public Comments

As discussed in the sections above, the City conducted extensive public outreach activities since 2020. These outreach efforts included presentations, a City Council study session, community workshops, digital media and an online platform, social media, mailers, advertisements, and noticed public hearings. In addition, the City engaged stakeholders including local affordable housing complexes and organizations, developers, social justice advocates, veteran groups, and organizations dedicated to addressing homelessness. Project materials, including summaries from community workshops, online surveys, public meetings, etc. are available on the City's website (www.commentcoronado.org/housing-element-update). An administrative record of public outreach efforts is also contained in Appendix A of this document.

Based on the total responses received throughout the course of these activities, the City created **Table 1. Community Comment Themes**, which identifies general themes from the feedback received, categorizing each comment by theme. It is important to note that the City received multiple comments from individuals across each of the outreach activities previously mentioned and this table below provides a summary of these comments, along with responses received from the community survey.

Table 1. Community Comment Themes	
Community Theme	Total Comments
General Opposition	438
Additional housing will increase vehicular, bicycle, and/or pedestrian traffic or accidents and reduce the amount of available parking	109
Updates to the General Plan and rezoning will increase density or reduce the availability of commercial sites, changing the City's character	56
New development will block views and/or decrease property values	55
More units will overcrowd or eliminate amenities, such as schools, pool, beach and boardwalk access, and grocery stores	50
Construction of units will cause safety concerns, such as access to hospitals, strain on infrastructure, a lack of police/firefighters, or blocked exits off of Coronado	50
New development will lead to increased noise, air, and/or light pollution, or other environmental concerns	13
The effects of new housing can harm tourism	7
In support of upzoning in locations specified by HE or in additional areas, including at military sites	6
Other (register all rental units, need more public outreach, needs more analysis, concerns regarding inclusion of military jobs)	5

B. Assessment of Fair Housing Issues

1. Summary of Data Results and Findings

It is important to note that the Affirmatively Furthering Fair Housing section of this Housing Element was prepared with analysis of Opportunity Sites only and does not include the Pipeline Sites, as specified in **Section 7. Adequate Sites Inventory Analysis and Methodology**. There are 100 Pipeline Sites (Sites 11 through 110) that have planned or approved units, or units in the process of being constructed. All units on Pipeline Sites are above moderate units. Therefore, an analysis of these residential units that are certain to be constructed during the 6th Cycle are not included in this section.

As detailed in the data and analysis presented in this **Appendix B** of the Housing Element, the following fair housing issues were identified:

- **Lack of Affordable Housing.** As shown in the data presented in this section of the Housing Element, Coronado homeowners are significantly cost-burdened (50.8%) compared to the County (38.8%). In addition, 57.2% of Coronado renters spend more than 30% of their income on housing costs, compared to 56.7% of the County average. The Housing Plan of this Housing Element includes 32 programs to encourage, facilitate and expand affordable housing in the City at all income levels. These programs include:
 - **Program H-1.A:** Accessory Dwelling Units (ADUs)
 - **Program H-1.B:** Technical Assistance to Developers
 - **Program H-1.F:** General Plan Update Program
 - **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
 - **Program H-2.B:** Local Funding for Affordable Housing
 - **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
 - **Program H-2.E:** Housing Choice Voucher Program
 - **Program H-2.G:** Regional Collaboration on Affordable Housing
 - **Program H-2.H:** Assist with the Development of Affordable Housing
 - **Program H-2.I:** Advertise Available Resources
 - **Program H-2.J:** Faith Based Properties
 - **Program H-2.K:** Amend Density Bonus Ordinance
 - **Program H-2.L:** Housing Choices
 - **Program H-3.A:** Assistance to Extremely Low-Income Households
 - **Program H-3.B:** Housing Opportunities for Persons with Special Needs
 - **Program H-3.C:** Senior Housing and Assisted Living Units
 - **Program H-3.E:** Affirmatively Further Fair Housing
 - **Program H-3.F:** Funding to Support Fair Housing
 - **Program H-3.G:** Analysis of Impediments to Fair Housing
 - **Program H-3.H:** Collaboration with Community-Based Organizations
 - **Program H-3.I:** Housing Mobility
 - **Program H-4.A:** Carriage House Program
 - **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
 - **Program H-4.D:** AB 1486 City-Owned Land
 - **Program H-5.A:** Streamline Processes
 - **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
 - **Program H-5.C:** Availability of Housing-Related Policies and Regulations
 - **Program H-5.D:** Compliance with AB 139 Requirements – Emergency Shelters
 - **Program H-5.E:** Update Farmworker and Employee Housing Zoning
 - **Program H-5.F:** Update the Accessory Dwelling Unit Ordinance
 - **Program H-5.H:** Nongovernmental Constraints

- **Moderate segregation.** According to the HCD Affirmatively Furthering Fair Housing (AFFH) 2.0 Data Viewer (AFFH 2.0 Data Viewer), Coronado consists of high White segregation census tracts in the central areas of the City, and Low-Medium Segregation census tracts to the north and south of the City. Overall, Coronado has a predominant population of White alone, not Latino or Hispanic, at a rate of 70.1% (2021 ACS 5-Year Estimates). Additionally, the City has three census tracts classified as Racially Concentrated Areas of Affluence of which these areas include a White alone, not Hispanic, or Latino population over 70% and a median income above the County's Area Median Income. This underscores the need for programs to increase housing opportunities for people of color and people with lower to moderate incomes. As a part of Coronado's efforts to further opportunities for fair housing for people of color, the City included the following goals and programs in **Section 8: Housing Plan**:
 - **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
 - **Program H-2.G:** Regional Collaboration on Affordable Housing
 - **Program H-3.B.** Housing Opportunities for Persons with Special Needs
 - **Program H-3.E:** Affirmatively Further Fair Housing
- **Lack of Community Support for Affordable Housing.** Community concerns about increased density and additional housing development is a contributing factor to fair housing and housing access in the City of Coronado. Information sharing with Coronado residents would increase awareness about what income levels qualify for "affordable housing" and comparing those to average incomes of seniors with social security as the main form of income, veterans, teachers, public safety, and other employees. The City has received comments objecting to the proposed increase of housing opportunities in the City, with specific objections to increases in density and affordable housing. As a part of Coronado's efforts to encourage community support for affordable housing, the City included the following goals and programs in **Section 8: Housing Plan**:
 - **Program H-3.A:** Assistance to Extremely Low-Income Households
- **Housing Mobility.** The increasing unaffordability of housing forces families to reside farther from jobs incurring higher transportation costs and sometimes experiencing displacement as a result. Coronado recognizes the importance of enabling residents to access housing, acknowledging the existing challenges of limited affordable housing options and the difficulty and expense of assembling sites large enough for an affordable housing project. Coronado seeks to provide greater housing mobility, enhancing residents' ability to choose their desired neighborhoods by providing diverse housing choices, supporting affordable housing, and encourage housing for various income levels, including seniors and/or veterans on fixed incomes that are increasingly priced out of the local rental market, early to mid-career teachers and public employees (including first responders and military personnel) and those employed by the vibrant tourism industry on the island. This approach not only fosters housing diversity but also improves the quality of life for all community members. As a part of Coronado's efforts to further housing mobility efforts, the City included the following goals and programs in Section 8: Housing Plan:
 - **Program H-2.L:** Housing Choices
 - **Program H-3.I.** Housing Mobility
 - **Program H-3.J.** Multi-Modal Mobility Enhancement
- **Fair Housing Enforcement and Outreach Capacity.** Currently, the Legal Aid Society of San Diego (LASSD) provides fair housing services to the City of Coronado through its contract with the County of San Diego. This includes providing fair housing outreach, education, investigation, and counseling services. Although

City residents are provided services and education by LASSD these resources may not be sufficient to resolve all discrimination. The City of Coronado does not have a contract for services with LASSD, which may limit fair housing services to meet the existing needs of residents. The SDC 2020-25 AI found that between FY 2014 and FY 2020, LASSD served over 19,000 client households, of which 38 households resided in the City of Coronado. Most client households served by LASSD were lower income (87%), White (66%), and resided in the City of San Diego (53%). Based on the data reported by LASSD, fair housing issues disproportionately affected some San Diego County residents. For example, Black residents made up less than 5% of the total County population yet represented 24% of fair housing complaints. Because the City does not contract directly with LASSD for fair housing, some issues experienced by residents may go unreported. To ensure that residents have better access to resources, the City will enter into a contract with LASSD, as evidenced in **Program H-3.E: Affirmatively Furthering Fair Housing Affirmatively Further Fair Housing and Provide Equal Housing Opportunities That Are Accessible To All Segments of the Coronado Community.**

- **Lack of Regional and Local Cooperation.** According to the SDC 2020-25 AI, the areas with the lowest scores of access to opportunity generally match the geographic distribution of minorities, low- and moderate-income persons, and poverty concentrations throughout the County. Some of these areas are connected to Coronado via the Coronado Bay Bridge. Among other contributing factors, lack of regional and local cooperation plays a role in the lack of access to opportunity. To mitigate this, the City will implement **Program H-2.G: Regional Collaboration on Affordable Housing** to explore partnerships and opportunities to increase housing opportunities through regional and local collaboration.

2. Housing Element Requirements

California Government Code (GOV), Section 65583(c)(10)(A)(ii), requires the City of Coronado to analyze areas of segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs including displacements risk. According to the California Tax Credit Allocation Committee (TCAC)/HCD 2023 Opportunity Areas Map, the City's census tracts have the following resource designations:

- **Census Tract 106.01** – High Resource (Navy-owned land)
- **Census Tract 108** - High Resource
- **Census Tract 109** - High Resource
- **Census Tract 110** - High Resource
- **Census Tract 111** – High Resource
- **Census Tract 113** – No Data (Navy-owned land)
- **Census Tract 216** – Moderate Resource (Navy-owned land)
- **Census Tract 218** – Highest Resource

As shown above, six of the eight census tracts are designated as Highest or High Resource, and one is designated as Moderate Resource (Census Tract 216). The remaining census tract (Census Tract 113) does not have enough data to be designated, as it encompasses the Naval Air Station North Island. There are no Low Resource areas or Disadvantaged Communities within Coronado.

Highest and High Resource areas are those with the highest index scores for a variety of educational, environmental, and economic indicators. Some of these indicators include high levels of employment, close proximity to jobs, access to effective educational opportunities for both children and adults, low concentrations of poverty, and low levels of environmental pollutants, among other factors. The Highest and High Resource areas across Coronado are likely a result of a strong business core, access to large employers, access to public transportation, and good environmental indicators in most, if not all, of the City, which have resulted in high property values.

To assist in this analysis of integration and segregation, HCD and TCAC convened the California Fair Housing Task Force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related State agencies/departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resource levels across the State “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low-income Housing Tax Credits (LIHTCs).” The maps are created using composite scores of three different “domains,” each consisting of a set of indicators. The maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- **Poverty:** Tracts with at least 30% of the population under the federal poverty line.
- **Racial Segregation:** Tracts with a location quotient higher than 1.25 for African Americans, Hispanics, Asians, or all people of color in comparison to San Diego County. High segregation and poverty census tracts are, therefore, areas of over-concentrated low-income and minority households with limited access to resources and pathways to success.

3. Data Sources

The City has conducted the following analysis with available data to assess local access to opportunities and indicators of fair housing issues in addition to the designations provided by the 2023 TCAC/HCD Opportunity Area Map (described in the next section). Data was available at the City and regional (County subdivision) levels, as well as the census tract level for poverty rates, opportunity areas, housing cost burden, job proximity, familial status, and disability. The 2021 ACS 5-Year Estimates for consistency with the HCD AFFH 2.0 Data Viewer (AFFH 2.0 Data Viewer) was utilized, including the most localized levels of data available. Finally, information from the SDC 2020-25 AI was also used for the analysis.

AFFH 2.0 Data Viewer

HCD provides the statewide AFFH 2.0 Data Viewer, which assembles various data sources and provides options for addressing each of the components within the full scope of the assessment of fair housing. The City used the AFFH 2.0 Data Viewer in combination with other local and regional data as directed by HCD. The AFFH map data layers are organized by:

- Fair Housing Enforcement and Outreach Capacity
- Segregation and Integration
- Disparities in Access to Opportunity
- Disproportionate Housing Needs, including Displacement Risks
- Racially and Ethnically Concentrated Areas of Poverty and Affluence
- Supplemental Data

California Tax Credit Allocation Committee/California Department of Housing and Community Development Opportunity Areas Map

Background

The 2023 TCAC/HCD Opportunity Area map uses composite index scores of three different domains (economic, environmental, and education) to categorize tracts as Low, Moderate, High, or Highest Resource. TCAC and HCD identify between one and five indicators for each domain. The indicators are:

- Poverty,
- Adult education,
- Employment,
- Job proximity,

- Median home value,
- Exposures and environmental effects, as measured for CalEnviroScreen 4.0,
- Math proficiency,
- Reading proficiency,
- High School graduation rates, and
- Student poverty rate.

Higher index scores indicate higher levels of access to opportunity. Scores are displayed in the “Disparity in Access to Opportunity” layers of the AFFH 2.0 Data Viewer. As described in this **Appendix B**, the City analyzed several additional factors to assess patterns that may further fair housing issues and to identify actions to combat these barriers to accessing opportunities. Categorization is based on percentile rankings for census tracts within the San Diego County region and higher composite scores mean higher resources.

Coronado Census Tracts

Figure 1. Coronado Census Tracts and Surrounding Cities provides a visual representation of the City's census tracts. In the context of this **Appendix B**, each of these census tracts will be identified as distinct neighborhoods, described as follows:

- **Census Tract 106.01** is located on the southeastern side of the City. The census tract is primarily residential and features a mix of single-family homes and multi-family units. The southern portion of this census tract also contains Silver Strand Training Complex (SSTC), which serves as a military training facility and does not have uses such as housing facilities.
- **Census Tract 108** is in the heart of the City and is the main tourism district. The census tract is primarily commercial and features a mix of shops, restaurants, and businesses.
- **Census Tract 109** is in the central part of the city. The census tract is primarily residential and features a mix of single-family homes and multi-family units. The area is known for its proximity to the Glorietta Bay Park.
- **Census Tract 110** is located on the southeastern side of the City. The census tract is primarily residential and features a mix of single-family homes and multi-family units.
- **Census Tract 111** is located on the southern side of the City. The census tract is primarily residential and features a mix of single-family homes and multi-family units.
- **Census Tract 113** is located on the western side of the City and is entirely comprised of the Naval Air Station North Island (NASNI), a federal military base, the birthplace of naval aviation and the largest aerospace employer in San Diego County.
- **Census Tract 216** is located on the eastern side of the City and is primarily occupied by the Naval Amphibious Base (NAB) and the Lincoln Military Silver Strand Housing.
- **Census Tract 218** is a completely residential census tract located on the perimeter of the Village area featuring a large majority of single-level properties that were mainly built in the 1950s. The area is bordered by Sunset View Park, McCain Blvd, Alameda Blvd, and the Pacific Ocean.

Coronado is comprised of eight census tracts in total. It is important to note that this **Appendix B** presents a series of maps showing seven of the eight census tracts. The 6th Cycle Opportunity Sites (Sites 1 through 10) are in six of the total eight census tracts. The exclusion of the eighth census tract, Census Tract 106.01, from maps following Figure 1 is intentional and serves to enhance clarity of the 6th Cycle Opportunity Sites.

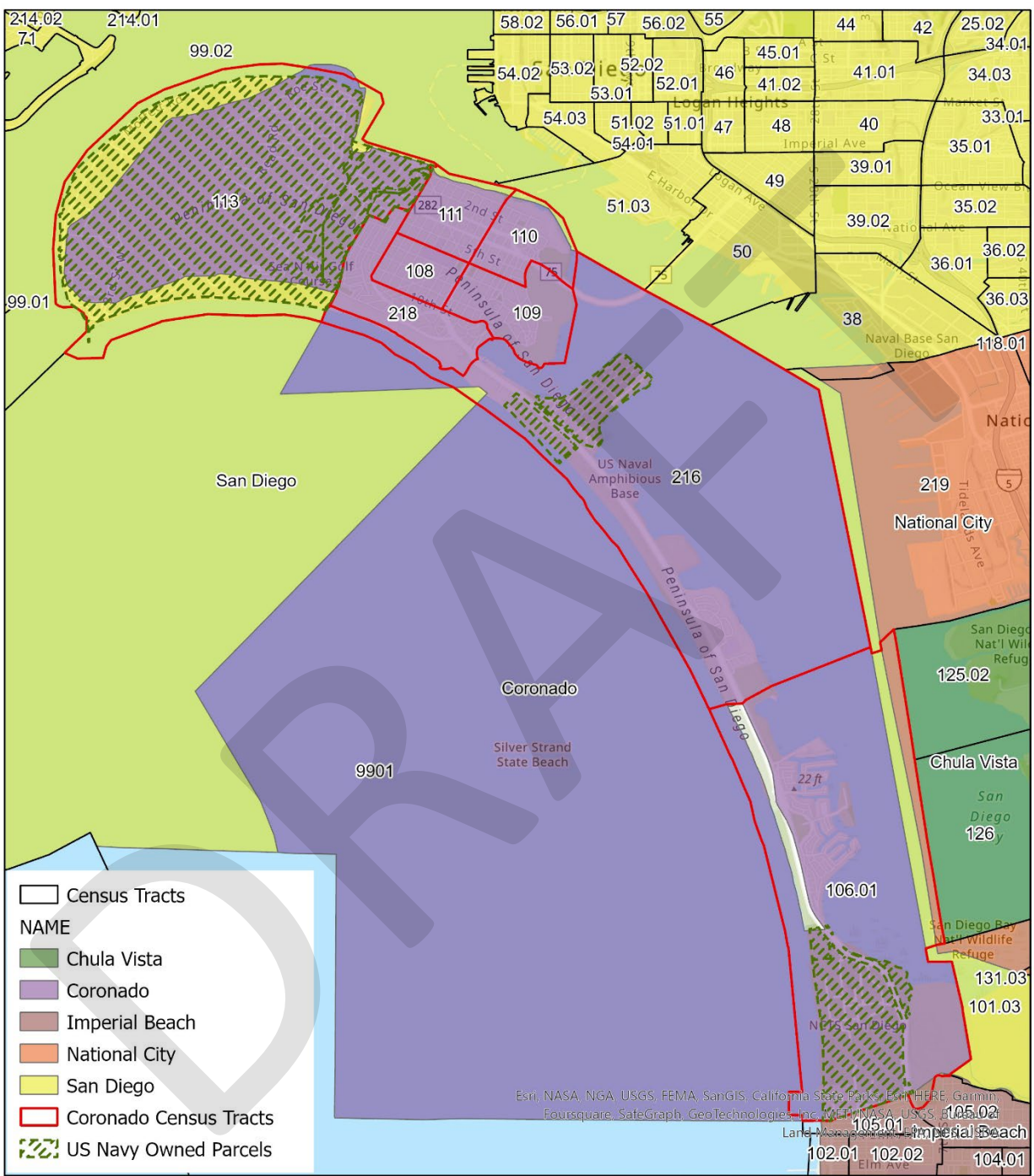
Census Tract 106.01 is shown in Figure 1 but is not shown in the remainder of the maps in this Appendix B because it does not contain any Opportunity Sites and including it in the mapping could introduce unnecessary complexity, potentially obscuring the critical depiction of opportunity sites within the seven relevant census tracts. This deliberate approach ensures a clear and unobstructed view of these opportunity sites, facilitating a more effective

analysis and understanding of the City's housing and development landscape, which focuses on these seven specific tracts.

It is important to note throughout this analysis that the U.S. Navy owns significant land portions in Census Tracts 113, 126, and 106.01. Overall, the U.S. Navy owns 67% of the land in the City. This is significant, as these specific census tracts may experience socioeconomic factors differently than other Coronado residents.

DRAFT

Figure 1. Coronado Census Tracts and Surrounding Cities



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Coronado Surrounding Cities and Census Tracts

City of Coronado Affirmatively Furthering Fair Housing

Coronado Opportunity Map Scores and Categories

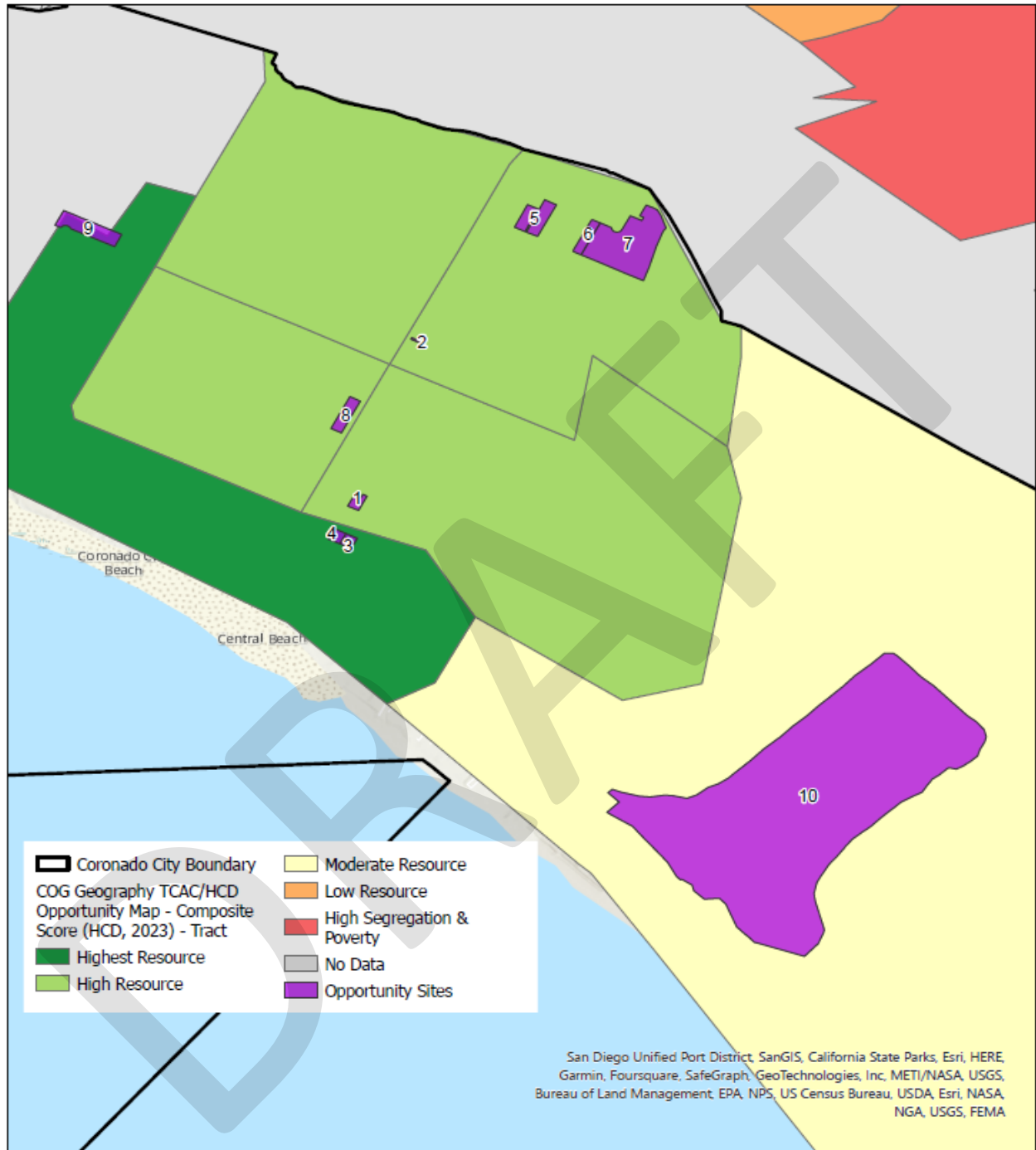
As mentioned in **Section 10. Housing Element Requirements** of this **Appendix B**, six of the eight census tracts in Coronado are designated as Highest or High Resource, and one is designated as Moderate Resource. The remaining census tract does not have enough data to be designated, as it encompasses the Naval Air Station North Island. There are no Low Resource areas or Disadvantaged Communities (per the TCAC/HCD Opportunity Map) within Coronado. Within San Diego County, most of the High and Highest Resource areas are located in the northern and coastal parts of the County.

Table 2. Opportunity Area Map Scores and Categorization shows the scores by domain for each census tract. In addition, **Figure 2. TCAC Opportunity Map Composite Score** illustrates the categorization of resource areas in and around the City.

Nine of the 10 Opportunity Sites (Sites 1 through 9) are located within High or Highest Resource areas, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) **is in a Moderate Resource area. It is important to note that Site 10 (within Census Tract 216) is the anticipated Navy housing that has already obtained federal funding and would not rely on public subsidies or low-income tax credits to fund the affordable units on the site.**

Census Tract	Economic Domain Score	Environmental Domain Score	Education Domain Score	Composite Index Score	Final Category
106.01	0.713	0.691	0.484	0.161	High Resource
108	0.966	0.480	0.564	0.441	High Resource
109	0.998	0.361	0.499	0.455	High Resource
110	0.991	0.026	0.557	0.254	High Resource
111	0.971	0.417	0.564	0.427	High Resource
216	0.467	0.092	0.615	-0.082	Moderate Resource
218	1.000	0.491	0.564	0.645	Highest Resource
Source: 2023 TCAC/HCD Opportunity Area Maps.					

Figure 2. TCAC Opportunity Map Composite Score



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Harris & Associates



0 0.25 0.5 Miles

TCAC Opportunity Map Composite Score

City of Coronado Affirmatively Furthering Fair Housing

4. Integration and Segregation Patterns and Trends

Segregation is defined as the separation or isolation of a race/ethnic group, national origin group, individuals with disabilities, or other social group by enforced or voluntary residence in a restricted area, by barriers to social connection or dealings between persons or groups, by separate educational facilities, or by other discriminatory means. To measure segregation in each jurisdiction, the Department of Housing and Urban Development (HUD) provides racial or ethnic dissimilarity trends. Dissimilarity indices are used to measure the evenness with which two groups (frequently defined on racial or ethnic characteristics) are distributed across geographic units, such as block groups within a community.

Segregation Patterns in San Diego County

San Diego County has a long history of housing segregation, which has contributed to the current patterns of racial and economic inequality in the region. As a part of the County, Coronado was not immune to the effects of segregation. The following are some key historical and current patterns of housing segregation in San Diego County:

- **Discriminatory Covenants:** According to a 2021 article published by KPBS¹, in the early 20th century, many neighborhoods in the County had "restrictive covenants" in their deeds that prohibited non-White residents from owning real estate. These covenants were legally enforceable until the Supreme Court declared them unconstitutional in 1948. Although the language of these covenants no longer appears in deeds, their legacy persists, as many neighborhoods, including those in Coronado, remain racially segregated today.
- **Redlining:** According to the City of San Diego's certified 6th Cycle Housing Element², in the mid-20th century, the federal government's Homeowners Loan Corporation (HOLC) created maps of cities across the country that graded neighborhoods based on their perceived risk for mortgage lenders. Neighborhoods with high percentages of non-White residents were often given the lowest grades, which made it difficult for residents to obtain mortgages and led to disinvestment in those areas. According to a cc article published by the San Diego Union-Tribune in 2020, Coronado was given an A grade and classified as a White-only neighborhood on the HOLC maps, which contributed to the racial and economic segregation of the time. Although the City and County have taken steps to mitigate the effects of redlining, they can still be seen in the County's racial and economic segregation today.
- **Current Patterns:** The 2021 KPBS article also states that, according to a recent UC Berkeley study, San Diego is more segregated today than it was 30 years ago. The study found that much of the segregation is still driven by race, with neighborhoods in the northern and coastal parts of the County being predominantly White, while Black and Hispanic neighborhoods are mostly confined to southern parts of the County. Coronado, which is located on a peninsula across the bay from downtown San Diego, is a predominantly White and affluent city.
- **Efforts to Address Segregation:** In recent years, there have been efforts to address housing segregation in San Diego County. For example, the City of San Diego has implemented new housing policies aimed at boosting racial integration and reversing the lingering effects of redlining, as stated in the City of San Diego's certified 6th Cycle Housing Element. However, some experts argue that these efforts do not go far enough and that more needs to be done to create homeownership opportunities for people of color in wealthy White areas.

¹ "How Discriminatory Covenants Shaped San Diego Homeownership." KPBS Public Media, 18 Nov. 2021, www.kpbs.org/news/local/2021/11/17/how-discriminatory-covenants-shaped-san-diego-homeownership.

² City of San Diego General Plan HOUSING ELEMENT 2021-2029, www.sandiego.gov/sites/default/files/he_final_screen_view_june2021.pdf. Accessed 26 Sept. 2023.

In conclusion, San Diego County has a long history of housing segregation, which has contributed to the current patterns of racial and economic inequality in the region. While there have been efforts to address this issue, more work needs to be done to create more equitable housing opportunities for all residents in the region.

Dissimilarity Index

The dissimilarity index is the most used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration of that group. An index score can range in value from 0 percent, indicating complete integration, to 100 percent, indicating complete segregation. An index number above 60 is considered to show high similarity and a segregated community. It means that 60% (or more) of the members of one group would need to move to a different tract in order for the two groups to be equally distributed. Values of 40 or 50 are usually considered a moderate level of segregation, and values of 30 or below are low.

It is important to note that segregation is a complex topic, difficult to generalize, and is influenced by many factors. Individual choices can be a cause of segregation, with some residents choosing to live among people of their own race or ethnic group. For instance, recent immigrants often depend on nearby relatives, friends, and ethnic institutions to help them adjust to a new country³. Alternatively, when White residents leave neighborhoods that become more diverse, those neighborhoods can become segregated⁴. Other factors, including housing market dynamics, availability of lending to different ethnic groups, availability of affordable housing, and discrimination can also cause residential segregation.

Figure 3. Dissimilarity Indices for Race and Ethnic Groups in Coronado (1980-2010) shows the dissimilarity between each of the identified race and ethnic groups and Coronado's White population from 1980 to 2010. The White (not Hispanic or Latino) population within Coronado makes up most of the City's population at approximately 70.7%, according to 2021 ACS 5-Year Estimates. As previously stated, higher scores indicate higher levels of segregation among those race and ethnic groups. The table shows higher levels of segregation among each race and ethnic group from 1990 to 2000, with a decrease in segregation in 2010. The group with the highest level of segregation in Coronado is Black at 60.3% in 1990, 63.6% in 2000, and decreasing to 36% in 2010. These scores correlate directly with the percentage of people within that racial or ethnic group that would need to move into a predominately White census tract to achieve a more integrated community. Groups who identified as Hispanic or Asian experience relatively low levels of segregation according to the data, at 16.1% and 12.4%, respectively, in 2010. While the dissimilarity index for the Black population has decreased, 36% is considered moderate segregation.

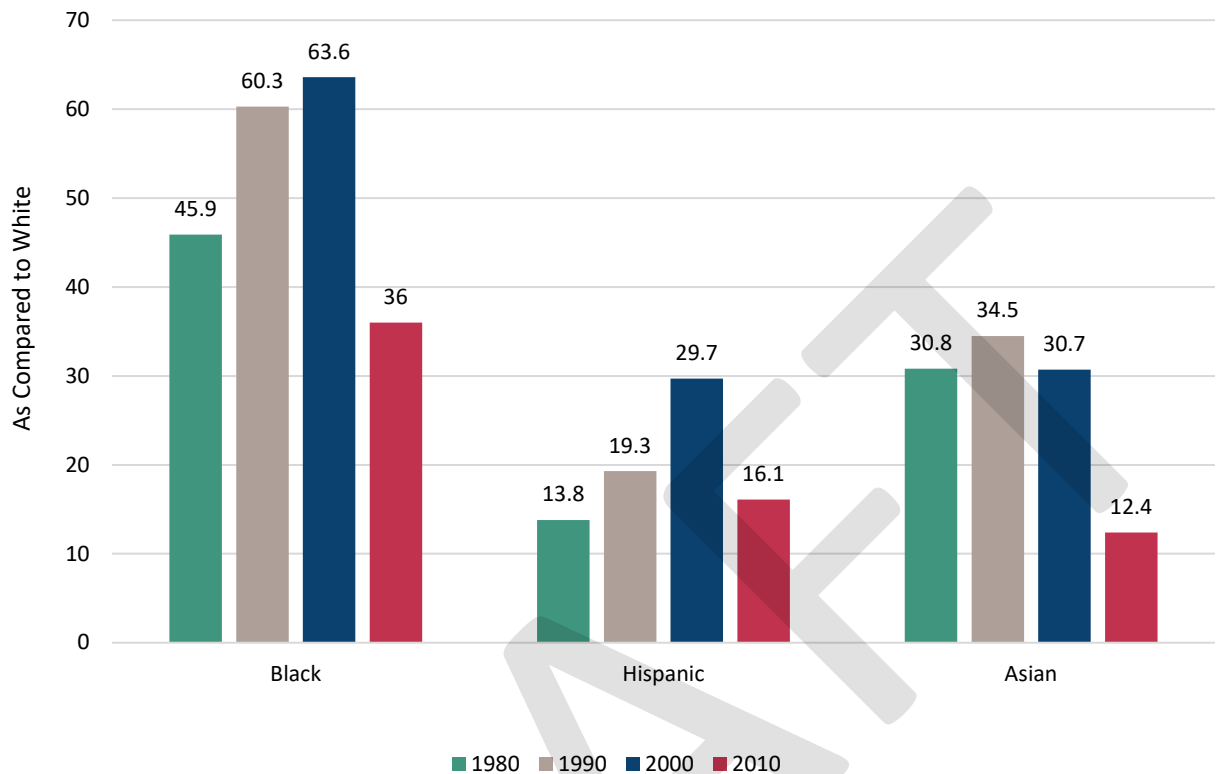
As a part of Coronado's efforts to further opportunities for fair housing for people of color, the City included the following goals and programs in **Section 8: Housing Plan**:

- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-3.B.** Housing Opportunities for Persons with Special Needs
- **Program H-3.E:** Affirmatively Further Fair Housing

³Allen, James P. and Turner, Eugene. "Changing Faces, Changing Places: Mapping Southern California". California State University, Northridge, (2002).

⁴ Boustan, Leah Platt. "Racial Residential Segregation in American Cities" in Oxford Handbook of Urban Economics and Planning, ed. Nancy Brooks and Gerrit-Jan Knaap, Oxford University Press, (2011).

Figure 3. Dissimilarity Indices for Race and Ethnic Groups in Coronado (1980-2010)



Source: Diversity and Disparity, Spatial Structures in the Social Sciences, Brown University

Racial Segregation and Integration

The AFFH 2.0 Data Viewer offers a comprehensive visualization of racial segregation and integration across distinct categories, including Racially Integrated, Low-Medium Segregation, High People of Color Segregation, and High White Segregation. The metric for evaluating racial segregation is based on census tracts and involves the assessment of a racial location quotient exceeding 1.25 for Black, Hispanic, Asian, or any people of color in comparison to the County's demographic composition.

Within Coronado, the central regions of the City (Census Tract 108, Census Tract 109, Census Tract 110, Census Tract 111, and Census Tract 218) are primarily characterized by High White Segregation census tracts. On the other hand, the northern/northwestern (Census Tract 113) and southern (Census Tract 216) areas exhibit Low-Medium Segregation census tracts. This spatial distribution is illustrated in **Figure 4. Racial Segregation/Integration**. Notably, **nine of the 10 Opportunity Sites (Sites 1 through 9) are situated within High White Segregation regions**, representing 184 lower income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10, representing 305 lower income and 69 moderate income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) is located within a Low-Medium Segregation area. It is important to note that Site 10 is the anticipated Navy housing that has obtained confirmed federal funding and would not rely on public subsidies or low-income tax credits to fund the affordable units on the site.**

The 2023 TCAC/HCD Opportunity Areas map integrates poverty and racial segregation indicators to comprehensively assess neighborhood demographics. Those census tracts that exhibit both a poverty rate exceeding 30% and are officially designated as racially segregated are classified as "High Segregation & Poverty" areas. The term

"concentration" is operationally defined as a census tract block group in which the proportion of a specific racial or ethnic group surpasses the countywide average for that group. **As depicted in Figure 10. High Segregation and Poverty, it is worth noting that there are no census tract block groups within Coronado designated as "High Segregation & Poverty" according to the TCAC/HCD maps.**

Moreover, to expand housing opportunities for Black and non-Black people of color as potential residents, the City will implement the following programs found in **Section 8: Housing Plan:**

- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents.
- **Program H-2.G:** Regional Collaboration on Affordable Housing.
- **Program H-3.B.** Housing Opportunities for Persons with Special Needs.
- **Program H-3.E:** Affirmatively Further Fair Housing Affirmatively

Predominant Race

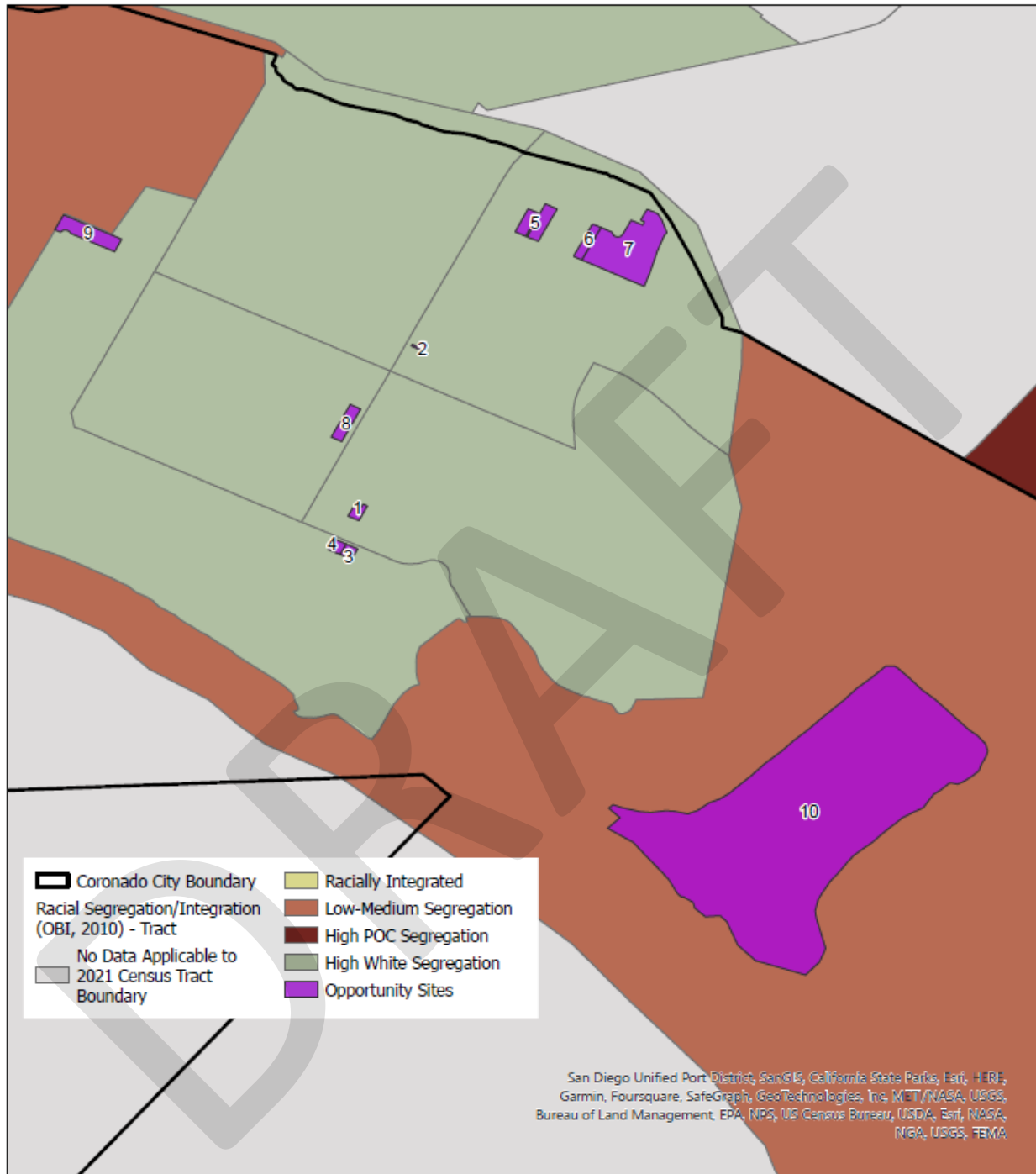
The AFFH 2.0 Data Viewer serves as an invaluable tool for visually ascertaining the predominant racial or ethnic groups within specific geographic areas, with particular emphasis on census tracts. The intensity of the color also indicates the extent to which one group is dominant over the next most populous.

According to the AFFH 2.0 Data Viewer, the entire City of Coronado has a predominant non-Hispanic/Latino White population. As shown in **Figure 5. Predominant Race, nine of the 10 Opportunity Sites (Sites 1 through 9) are situated in regions with a predominance of White Alone, not Hispanic or Latino residents**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units), is in an area with low-medium segregation. **It is important to note that Site 10 is the anticipated Navy housing that has obtained confirmed federal funding and would not rely on public subsidies or low-income tax credits to fund the affordable units on the site.** Moreover, according to the 2021 ACS 5-Year Estimates, Coronado has a predominantly non-Hispanic/Latino White population that makes up 70.1% of the total population in the City and is substantially higher than the County average of 44.1%.

To increase housing opportunities for Black and non-Black people of color as potential residents, the City is proposing the following housing programs, also found in **Section 8: Housing Plan:**

- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.E:** Affirmatively Further Fair Housing

Figure 4. Racial Segregation/Integration



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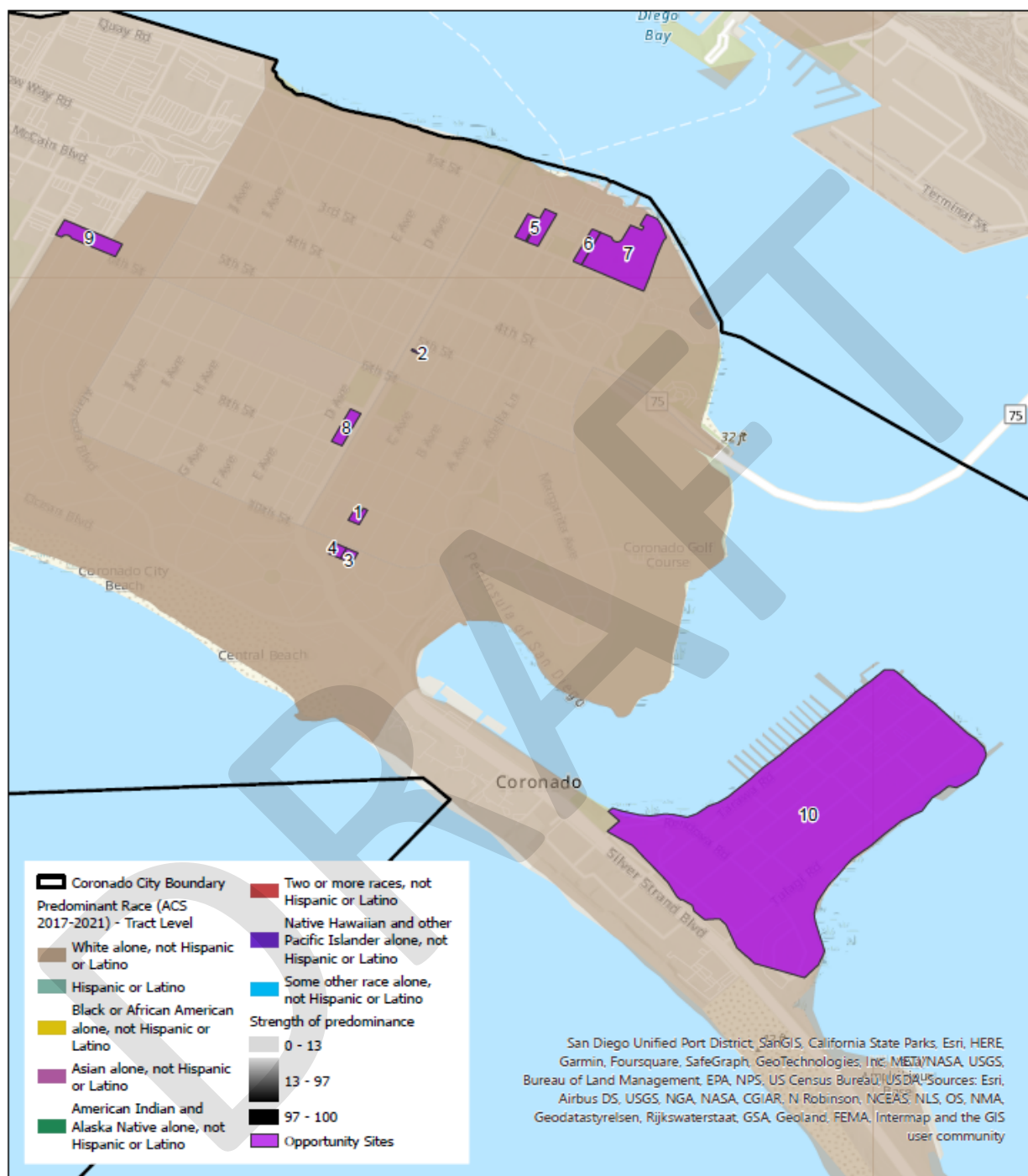


0 0.25 0.5 Miles

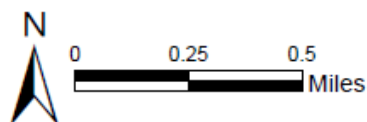
Racial Segregation/Integration

City of Coronado Affirmatively Furthering Fair Housing

Figure 5. Predominant Race



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Predominant Race

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Areas with Limited English Proficiency

California, and specifically San Diego County, has long been an immigration gateway to the United States, which means that many languages are spoken throughout San Diego County. Since learning a new language is universally challenging, it is not uncommon for residents who have immigrated to the United States to have Limited English Proficiency (LEP). This limit can lead to additional disparities if there is a disruption in housing, such as an eviction, because residents might not be aware of their rights, or they might be wary to engage due to immigration status concerns. Those with LEP may be more susceptible to discrimination due to limited English proficiency.

According to the 2021 5-Year ACS Estimates, approximately 10% of Coronado residents were foreign-born. This data is important so the City can ensure residents are treated fairly in housing regardless of national origin. The foreign-born portion of the population may be more susceptible to discrimination due to limited English proficiency. The U.S. Census Bureau defines a “linguistically isolated household” as a household in which all members aged 14 years and older speak a non-English language and speak English less than “very well.” The ACS provides information on households with populations five years of age and over who speak English “less than very well.”

In Coronado, the percentage of linguistically isolated population is an estimated 3.3% of the population, which is significantly lower than the County rate of 13.1%. Just like in San Diego County, the most spoken language for those in Coronado with LEP is Spanish.

Language barriers may not only prevent residents from accessing services, information, and housing but may also affect educational attainment and employment. Furthermore, as stated on the SDC 2020-25 AI:

“Executive Order 13166 (“Improving Access to Services by Persons with Limited English Proficiency”) was issued in August 2000, which requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to Limited English Proficiency (LEP), cannot fully and equally participate in or benefit from those programs and activities. This requirement passes down to grantees of federal funds as well.”

Coronado is connected via the Coronado Bay Bridge to areas with high segregation levels and poverty as shown in **Figure 10. High Segregation and Poverty**. Its direct connection to areas with high segregation and poverty necessitates proactive measures to ensure that all residents can access vital services, information, and housing opportunities. To address LEP issues, the City will implement **Program H-3.E: Affirmatively Further Fair Housing and Provide Equal Housing Opportunities That Are Accessible To All Segments of the Coronado Community**.

These initiatives will involve contracting with service providers to deliver language translation and interpretation services, particularly for LEP individuals. Additionally, local organizations, such as the Legal Aid Society of San Diego, offer information in multiple languages like Spanish, Tagalog, Farsi, and Vietnamese, along with volunteer interpreters/translators, further enhancing language accessibility.

Supporting LEP residents in Coronado is pivotal for building an inclusive, diverse, and flourishing community. It ensures equitable access to essential services and housing opportunities, promoting community stability and economic growth. It also plays a crucial role in public health and safety, aligning with local, state, federal, and ethical legal obligations to maintain fair housing practices. By proactively addressing the unique challenges faced by this population, the City actively contributes to creating a more equitable, vibrant community where every resident's contribution and well-being are valued and respected.

Language Access in the County

The SDC 2020-25 AI identified racial segregation and linguistic isolation as contributing factors to fair housing issues in San Diego County. The SDC 2020-25 AI includes two recommended programs including:

- Diversify and expand the housing stock to accommodate the varied housing needs of different groups.
- Promote equal access to information for all residents.

- Update the LEP plan to reflect demographic changes in the community per Executive Order 13166 of August 11, 2000.
- The City of Coronado's adoption of Program H-3.E: Affirmatively Further Fair Housing and Provide Equal Housing Opportunities That Are Accessible To All Segments of the Coronado Community aligns with the County's objectives.

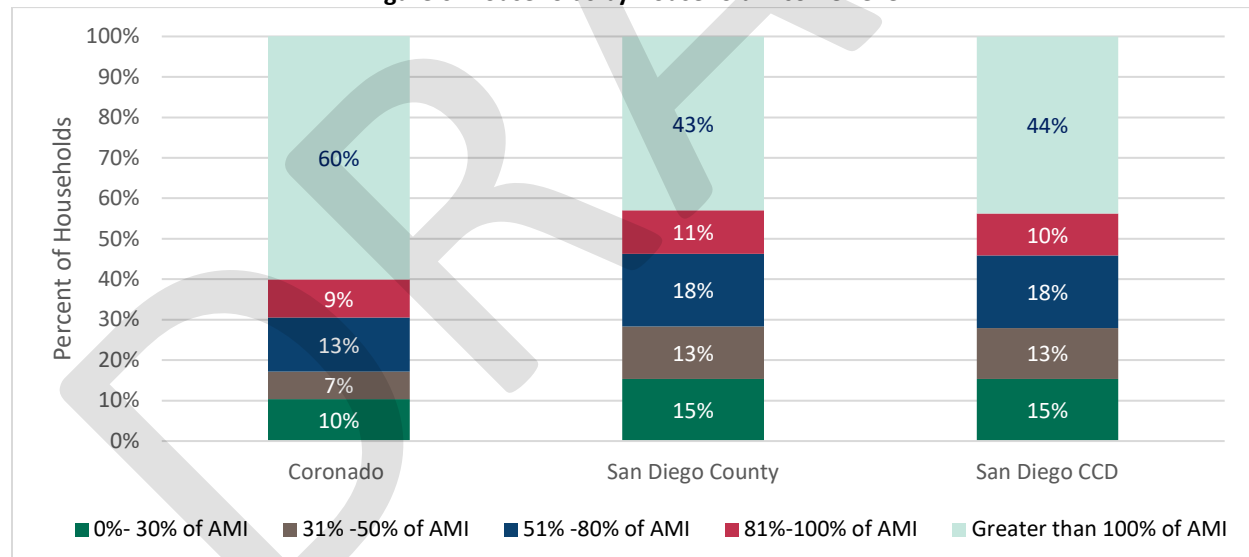
By adopting these programs, the City actively contributes to ensuring that residents, regardless of their language proficiency, have equal access to essential housing information and opportunities, directly addressing the SDC 2020-25 AI's recommendations to enhance fair housing practices in the region. These programs will play a crucial role in promoting housing diversity, ensuring equitable access, and addressing housing disparities.

5. Income Trends and Patterns

San Diego County is commonly known for its booming economy, highly skilled workforce, competitive wages, and soaring housing costs - Coronado is no exception to this trend. Over half of Coronado's households have a median income greater than Area Median Income (AMI) for San Diego County. According to HCD's "Revised State Income Limits for 2021" letter dated December 31, 2021, the AMI in San Diego County was \$95,100 in 2021.

As shown in **Figure 6. Households by Household Income Level**, 60% of Coronado households had a household income exceeding the median income, 9% had low incomes, 13% had very low incomes, and 17% of households had extremely low and acutely low household incomes. As evidenced by **Figure 6**, Coronado has a higher share of above-median income households than the County (43%) and San Diego Community College District (44%) and lower share of lower-income households than the County (57%) and San Diego CCD (56%).

Figure 6. Households by Household Income Level



Source: HUD, CHAS ACS tabulation, 2016–2020 release

The income information for all Opportunity Sites is shown in **Figure 7. Median Household Income**. The highest incomes in Coronado are concentrated in Census Tract 109, 113, and 218, which house the wealthiest population with median household incomes ranging from \$120,000 to \$175,000+.

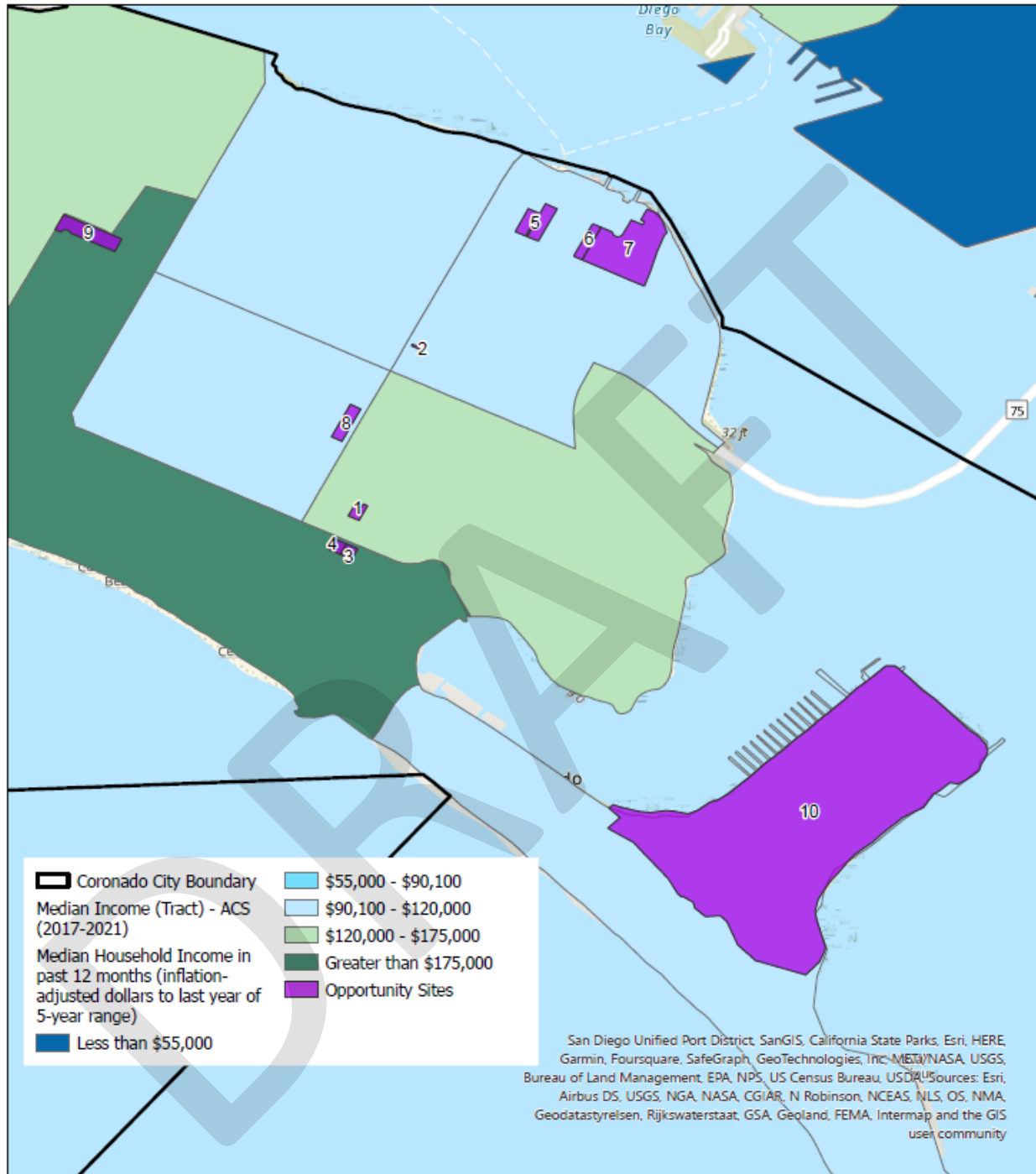
As shown in **Figure 7**, six of the 10 Opportunity Sites (Sites 2 and Sites 5 through 8 and Site 10) are located within the census tracts in the City with the lowest household incomes, ranging from \$90,100 to \$120,000. The six sites represent 397 lower (81.2% of the total lower-income units), 124 moderate (78.5% of the total moderate-income units), and 164 above moderate-income housing units (91.1% of the total above moderate-income units).

Furthermore, despite these census tracts having the lowest household incomes in the City, all three have median household incomes ranging from \$97,287 to \$112,564 and exceeding the San Diego County 2021 median household income (\$95,100), as published by HCD.

Site 10 represents 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units). **It is important to note that Site 10 is the anticipated Navy housing that has already obtained federal funding and would not rely on public subsidies or low-income tax credits to fund the affordable units on the site.**

The remaining four Opportunity Sites (Sites 1, 3, 4, and 9) are located in census tracts with a median income of over \$120,000, representing 92 lower income and 34 moderate-income units (18.8% of the total lower-income units and 21.5% of the total moderate-income units). The remaining sites are Pipeline sites that are 100% planned and approved above moderate-income units and are not mapped as part of this analysis.

Figure 7. Median Household Income



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



0 0.25 0.5
 Miles

Median Household Income

City of Coronado Affirmatively Furthering Fair Housing

Lower Income Unit Proximity to Transportation

HCD's Intersectional Policy Work webpage asserts the following regarding housing and transportation:

"After housing, transportation is the second-largest household expense... People who live near transit and job centers drive less, particularly lower-income residents. More recently, however, those areas have become less and less affordable. Housing near transit is in high demand, and rents and property values near transit are 10 to 20% higher on average than similar homes further from transit. Modeling and analysis by the Legislative Analyst's Office suggest that 'California's high housing costs cause workers to live further from where they work, likely because reasonably priced housing options are unavailable in locations nearer to where they work.' When households move further from job- and transit-rich areas to find more affordable homes, they encounter higher transportation costs and longer commutes. Beyond the quality-of-life consequences for individual households, longer commutes also increase greenhouse gas emissions and decrease productivity."

As sustained by HCD, lower-income households benefit from housing near transportation, which provides accessibility to jobs, amenities, and services. Due to the increased demand for housing near transit, lower-income households are much more vulnerable to displacement and housing cost burden.

As shown in **Figure 8. Bus Stops with ½ Mile Buffer, nine of the 10 Opportunity Sites (Sites 1 through 9) are within ½ mile of a bus stop**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) is outside of the ½-mile radius.** The City has several transportation options available to residents and visitors to reduce traffic and pollution, while increasing accessibility to jobs, services, and recreation.

To mitigate the effects of increased development near amenities, services, and transportation, Coronado planned for the development of affordable housing near the Core Area of the City (Census Tracts 108, 110, and 111), where lower-income families would be less vulnerable to extreme housing cost burden and displacement.

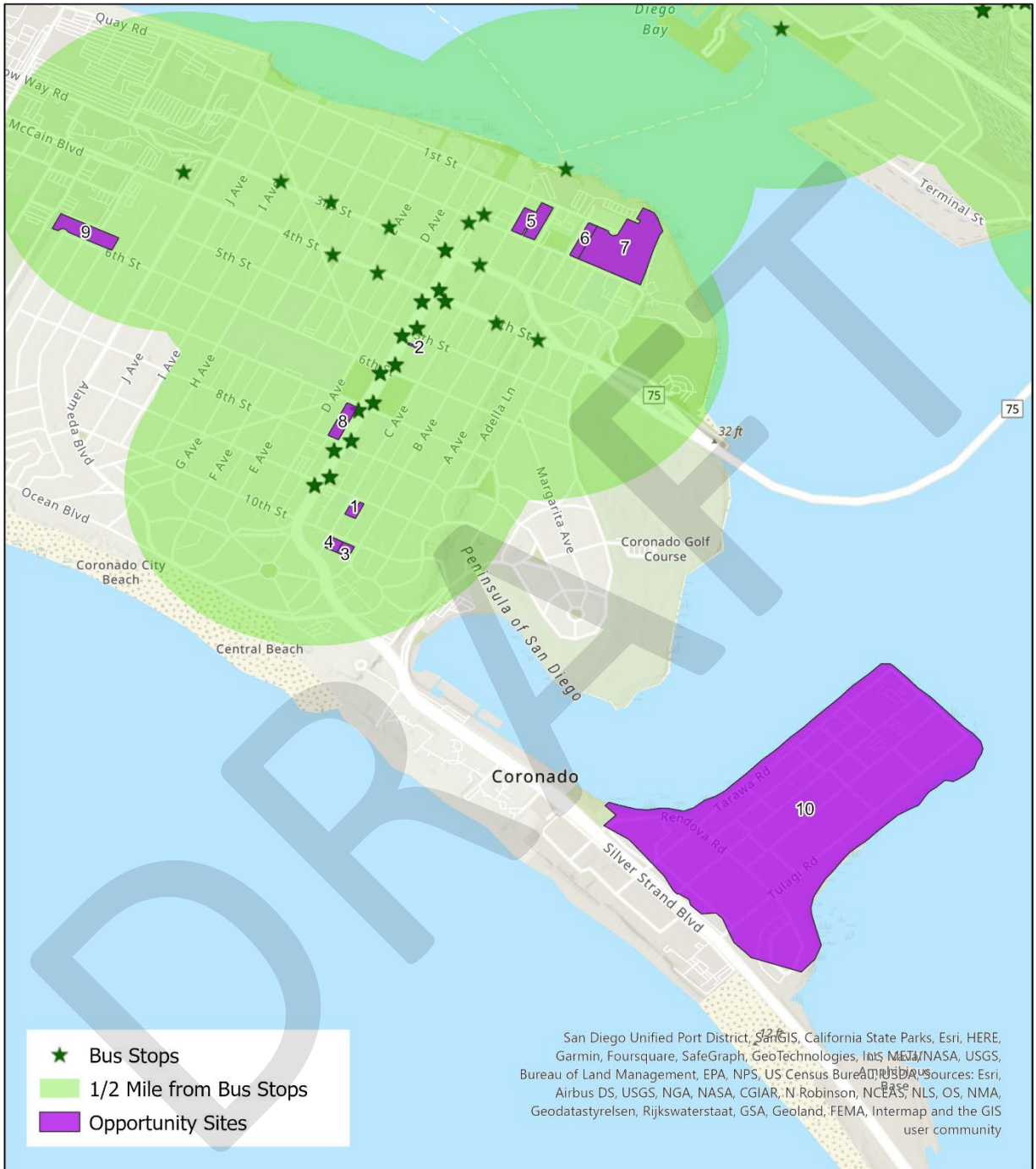
The City considers housing mobility to be an essential element of helping the community thrive. To continue its efforts to increase housing mobility, the Housing Plan contains the following programs:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations
- **Program H-3.I:** Housing Mobility
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.D:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Processes

- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

DRAFT

Figure 8. Bus Stops with ½ Mile Buffer



0 0.25 0.5 Miles

Coronado Bus Stops with 1/2 Mile Buffer

City of Coronado Affirmatively Furthering Fair Housing

Poverty Status

Concentrations of poverty are not prominent in Coronado. A concentrated area of poverty is defined by HUD as a census tract where the percentage of individuals living in households with incomes below the poverty rate is more than the lesser of 40% or three times the average poverty rate for the metropolitan area. The City is within the San Diego metropolitan area, where the average household poverty rate (according to 2021 ACS 5-Year Estimates) is approximately 10.7%.

According to the AFFH Data Viewer 2.0, Coronado census tracts exhibit a notably low concentration of residents living below the poverty level, with figures dipping below 10%. The exception is Census Tract 113 with a poverty rate at 24%. It is important to note that while Census Tract 113 has the highest poverty rate, it also has some of the highest median incomes (See **Figure 7**).

As shown in **Figure 9. Poverty Status**, **eight of the 10 Opportunity Sites (Sites 1 through 7 and 9) are located within areas with a poverty concentration below 10%**, representing 137 lower-income and 89 moderate-income units (28.0% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining two Opportunity Sites (Site 8 and 10) are in a census tract with poverty concentrations between 10% and 20%** representing 352 lower-income and 69 moderate-income units (72.0% of the total lower-income units and 43.7% of the total moderate-income units).

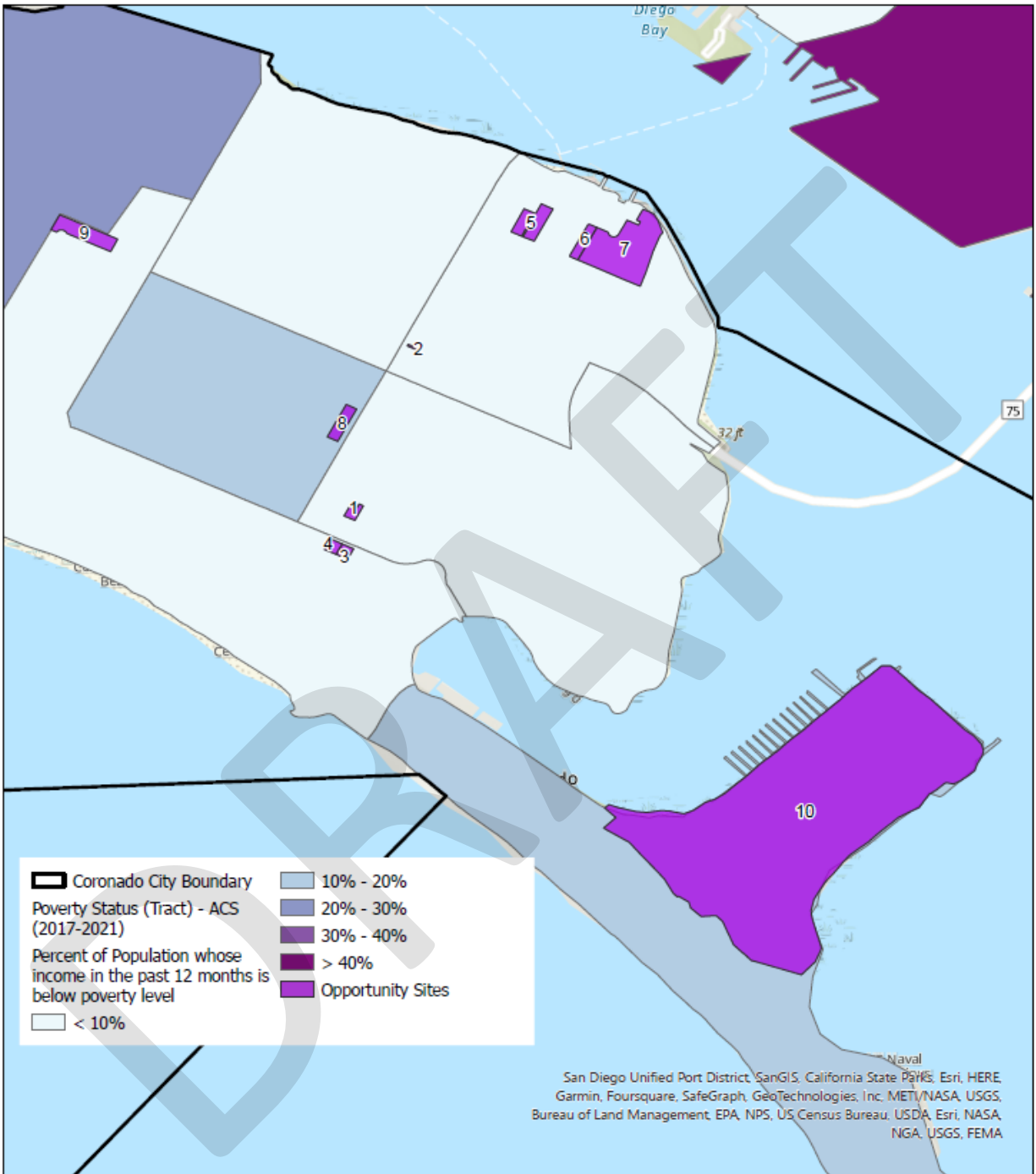
Site 10, the anticipated Navy housing project on the Navy base, is also in a census tract with poverty concentrations between 10% and 20% representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units). It is important to note that the Navy requires many of its enlisted employees to live on the base and the incomes of Navy employees are often lower than in the private sector.

While census data cited above does not indicate high concentrations of poverty across the City, other data and analysis presented in this section of the Housing Element indicate that one of the primary fair housing issues in Coronado is a lack of housing choice and mobility caused by a lack of affordable housing. To address this ongoing issue, the Housing Plan contains 29 programs specifically targeted to encourage and facilitate the development of affordable housing units in the City. This effort will increase the number of affordable housing units and support access to resources such as housing choice vouchers, thereby alleviating the lack of housing choice and fostering greater housing mobility. These programs include the following:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.F:** Funding to Support Fair Housing

- **Program H-3.G** Analysis of Impediments to Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations
- **Program H-3.I:** Housing Mobility
- **Program H-3.J.** Multi-Modal Mobility Enhancement
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.D:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Processes
- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

Figure 9. Poverty Status



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Harris & Associates



0 0.25 0.5 Miles

Poverty Status

City of Coronado Affirmatively Furthering Fair Housing

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP)

Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) are geographic areas with significant concentrations of poverty and minority populations. Identifying R/ECAPs facilitates an understanding of entrenched patterns of segregation and poverty due to the legacy effects of historically racist and discriminatory housing laws. To assist communities in identifying R/ECAPs, HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-White population of 50% or more. Regarding the poverty threshold, HUD defines neighborhoods of extreme poverty as census tracts with 40% or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Location of residence can have a substantial effect on mental and physical health, education opportunities, and economic opportunities. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. However, these areas may also provide different opportunities, such as ethnic enclaves providing proximity to centers of cultural significance, or business, social networks, and communities to help immigrants preserve their cultural identity and establish themselves in new places. Overall, it is important to study and identify these areas to understand patterns of segregation and poverty in Coronado.

The AFFH 2.0 Data Viewer confirms that there are no R/ECAPs in Coronado or no census tracts with high levels of segregation and poverty. However, across the bay and northeast of Coronado, there is a R/ECAP identified within downtown San Diego, as shown in **Figure 10. High Segregation and Poverty**. While the R/ECAP identified in San Diego across the Coronado Bridge is not within the City's boundaries, the City's tourism economy depends on workers living outside of Coronado in the City or County of San Diego.

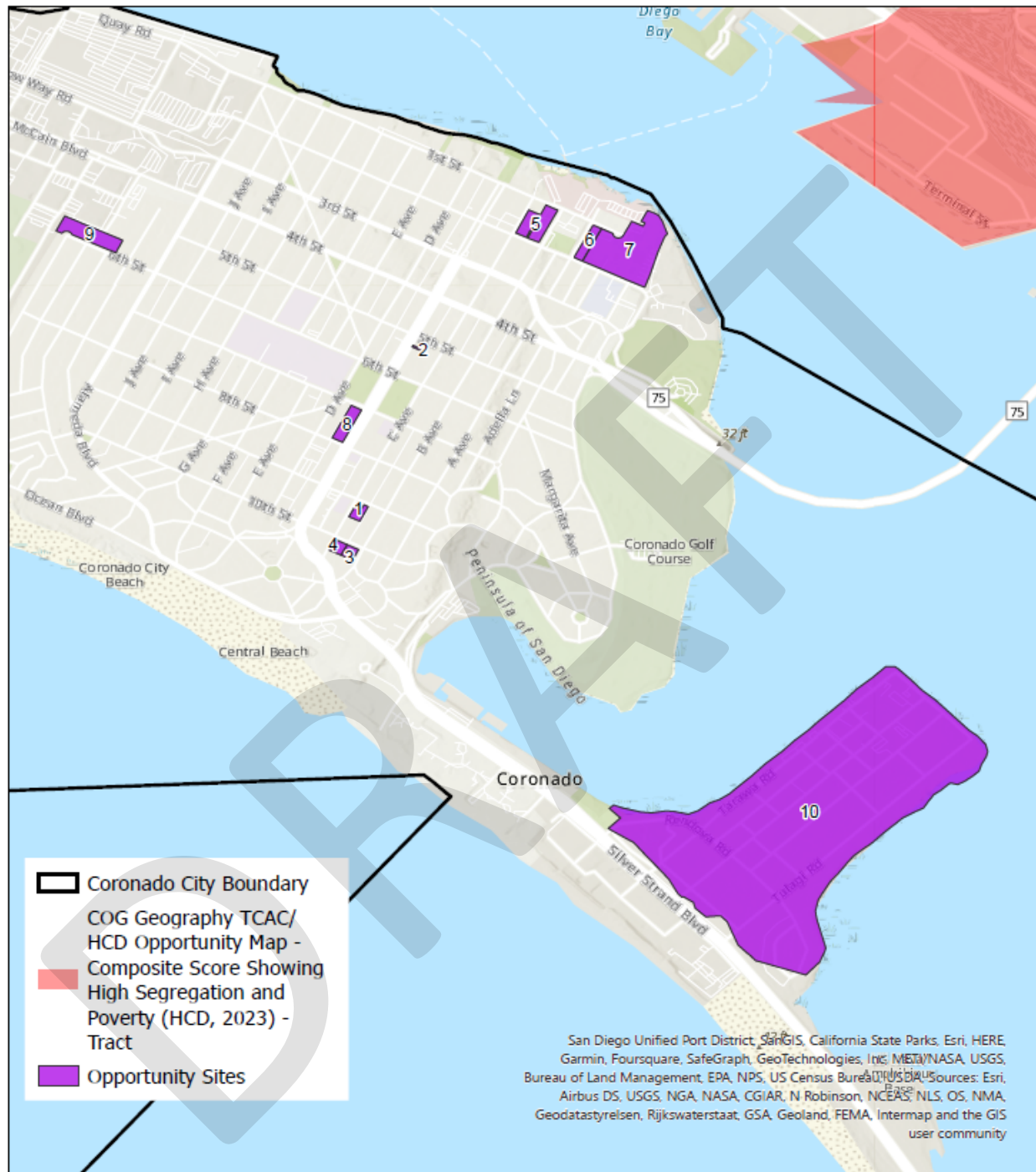
The City recognizes the importance of housing options for all the members of its community. As such, **Section 8: Housing Plan** includes the following programs to facilitate affordable housing for lower-income households both in and outside of Coronado:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.F:** Funding to Support Housing
- **Program H-3.H:** Collaboration with Community Based Organizations

- **Program H-3.I:** Housing Mobility
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.D:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Process
- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

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Figure 10. High Segregation and Poverty



0 0.25 0.5
Miles

TCAC Opportunity Map High Segregation and Poverty

City of Coronado Affirmatively Furthering Fair Housing

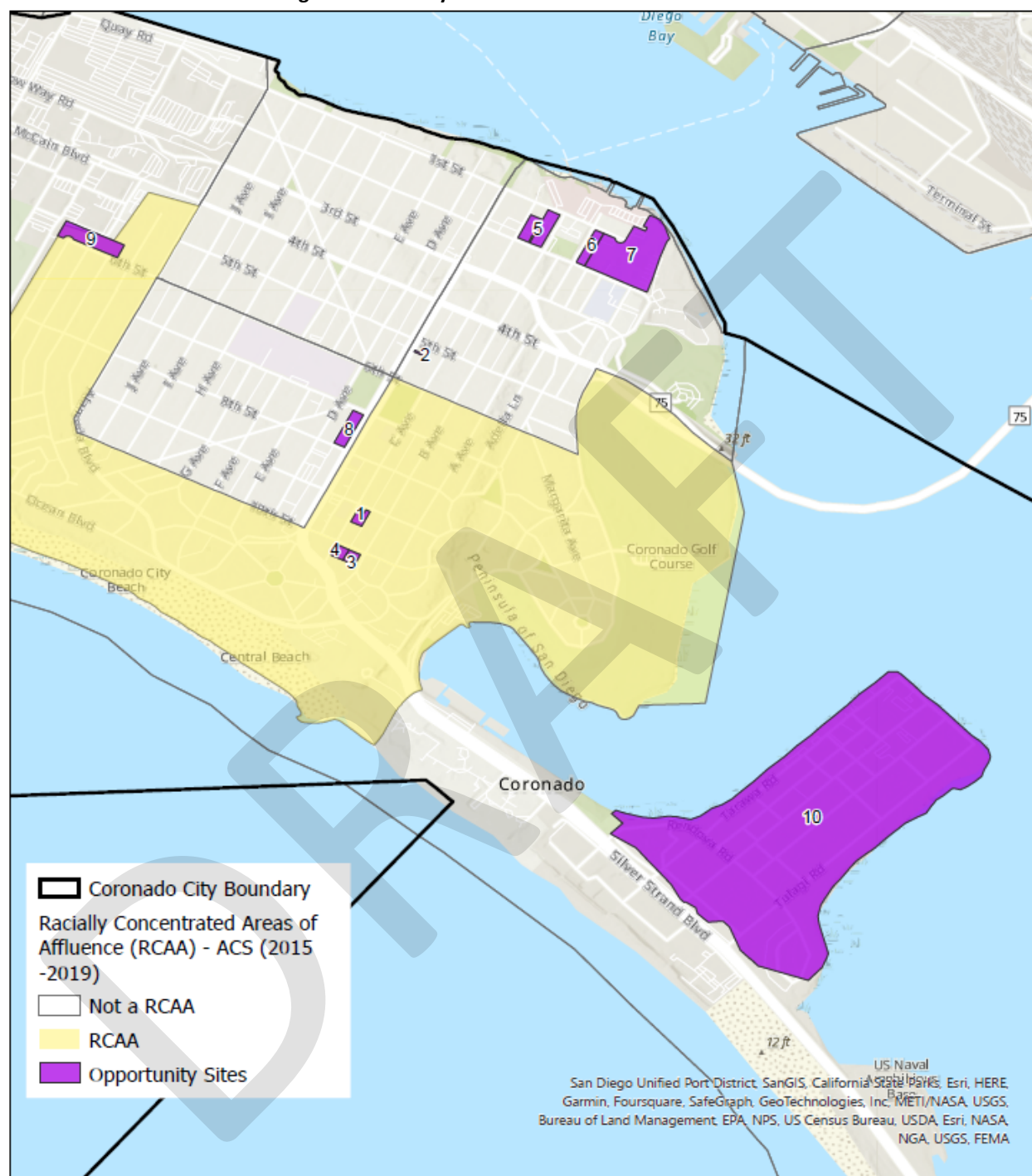
Racially Concentrated Areas of Affluence (RCAs)

While R/ECAPs have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to “Racially Concentrated Areas of Affluence: A Preliminary Investigation” authored by Edward G. Goetz, Anthony Damiano, and Rashad A. Williams of the Center for Urban and Regional Affairs, University of Minnesota (a policy paper published by HUD), RCA is defined as an affluent, White community. The policy paper goes on to state that “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.”

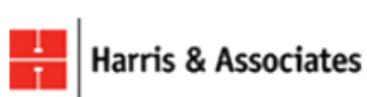
HCD has created a new version of the RCA metric to better reflect California’s relative diversity and regional conditions, and to aid local jurisdictions in their analysis of racially concentrated areas of poverty and affluence pursuant to AB 686 and AB 1304. The RCA methodology uses the Location Quotient (LQ) for each California census tract using data from the ACS to represent the percentage of total White population (White Alone, Not Hispanic or Latino) for each census tract compared to the average percentage of total White population for all census tracts in a given council of governments (COG). Through this process, census tracts with an LQ greater than 1.25 and a median income 1.5 times higher than the COG’s AMI (or 1.5 times the State AMI, whichever is lower) were considered an RCA.

According to the AFFH 2.0 Data Viewer, three of the eight census tracts in Coronado are considered RCAs. Two of the three census tracts, Census Tracts 109 and 218, are shown in Figure 11. Racially Concentrated Areas of Affluence. According to the 2021 ACS 5-Year Estimates, Census Tract 218 has a median household income of \$177,333 and an 82.5% White population, while Census Tract 109 has a median household income of \$148,155 and an 82.8% White population. As shown in **Figure 11, four of the 10 Opportunity Sites (Sites 1, 3 through 4, and 9),** representing 92 lower income and 34 moderate-income units (18.8% of the total lower-income units and 21.5% of the total moderate-income units) **are located within an RCA.** The third RCA is in Census Tract 106.01 with a median income of \$170,455 and a 63.5% White population (2021 ACS 5-Year Estimates). As shown in **Figure 1. Coronado Census Tracts and Surrounding Cities,** Census Tract 106.01 is directly adjacent to the City of Imperial Beach. It is important to note that **Census Tract 106.01 is not shown in Figure 11, as there are no opportunity sites located in this neighborhood.** For the San Diego Association of Governments (SANDAG) as a whole, the average percentage of total White population was 47.9%, and the average median household income for the County was \$91,003. This data indicates that White households in Coronado are more affluent (based on median income) as compared to White households in San Diego County.

Figure 11. Racially Concentrated Areas of Affluence



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Racially Concentrated Areas of Affluence

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6. Exclusionary Housing Practices

Research on past exclusionary housing practices in San Diego County was also reviewed to learn if such practices were a part of Coronado's history, and to investigate if past practices have contributed to current housing conditions and areas of affluence. A 2020 report compiled by the Local Initiatives Support Corporation (LISC) provides historical maps and narrative of housing discrimination encountered in San Diego as early as the 1930s. Moreover, coastal property deeds often featured racially restrictive covenants that denied people of color fair opportunities to live along the coast until the passage of the Fair Housing Act of 1968. Such legalized tactics for housing discrimination, coupled with increasing wealth disparities and policy-based segregation laws, has shaped the demographic makeup and wealth patterns of San Diego's neighborhoods, resulting in what remains a majority-White population along the coast.

Between the 1930s and 1960s, "redlining" was a federally endorsed commercial practice used to prevent people of color from purchasing homes in certain neighborhoods. The Federal Homeowners Loan Corporation (HOLC) established boundaries around neighborhoods based on composition of resident income levels, race and/or ethnicity, and housing and land use types then assigned investment risk grades from Grade A as "Best" to Grade D as "Hazardous." Often, neighborhoods with Grades C and D were where people of color and immigrants resided. According to the 2020 LISC report, Coronado is shown to have been rated as a "desirable" place to live (areas graded A and B where higher concentrations of White populated resided); however, the northern portion of the City was rated as "definitely declining" (areas graded C where the service population and African American residents resided).

The founder of the Coronado Black History Project, Kevin Ashley, found that Coronado was not exempt from the segregation patterns and housing discrimination across the County. The Coronado Black History Project is an online archive documenting the experiences and untold stories of Black Americans living in Coronado since the City's founding in 1887. The findings of the Coronado Black History Project confirm that the 1900 census identifies three African American families living in Coronado at the time. Before their arrival in Coronado, many of these families were enslaved or came from multiple generations of their family who had been enslaved. Ashley discovered that between 1921 and 1950, only one African American family was able to buy a property in Coronado. The HOLC "redlined" map of 1938 for Coronado prevented Black families from purchasing homes.

Given the history of racially exclusionary practices in the San Diego region, it is possible that Coronado's development and population were influenced by these past practices. However, the impact of these practices has been reduced in part because approximately 78% of the City's housing stock was built after the 1948 Supreme Court case *Shelley vs. Kraemer* (which rendered racially restrictive real estate covenants unenforceable), and 30% of the City's housing stock was built in the decade preceding the passage of the Fair Housing Act of 1968.

Despite the passing of fair housing laws and the City's increase in housing stock, Black residents were still left with limited housing opportunities. According to the Coronado Black History Project, many of Coronado's diverse residents resided in the Federal Housing Project on Mullinix Drive (near present day Tidelands Park) between the 1940s to the 1960s. In 1956, between 400-500 African American resided in these apartments, which accounted for about 20% of residents in the Federal Housing Project, and nearly 5% of the City's population. Unfortunately, the City took ownership of the apartments and began eminent demolition by 1957.

In the past 50 years, the racial makeup of the City has not changed. The U.S. Census shows that although the White population decreased from 94% in 1970 to 86% in 1990, it then increased to 90% in 2020. The Black population has only increased slightly from 2% in 1970 to 7% in 1990, and then back down to 4% in 2020. The City will implement the following programs to increase fair housing outreach to Black and non-Black people of color as potential residents:

- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-3.B:** Housing Opportunities for People with Special Needs

- **Program H-3.E:** Affirmatively Further Fair Housing and Provide Equal Housing Opportunities That Are Accessible To All Segments of the Coronado Community

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, or the marital status of the head of household.

Adults Living Alone or With Spouse

The percentage of adults living with their spouse or partner in the City is 18% higher than that of the County. More specifically, according to the 2020 ACS 5-Year Estimates, the percentage of adults living with their spouse or partner is approximately 63.7% in Coronado, compared to approximately 45.7% of adults countywide. Local census tracts with the highest shares of adults living with their spouse or partner are located mainly along the City's western coast, as seen on **Figure 12. Percent of Adults Living with Spouse.**

Additionally, 13.3% of Coronado heads of a household and 11.0% of County heads of households live alone. As shown on **Figure 13. Percent of Adults Living Alone**, adults living alone primarily reside in the eastern area of the City; particularly in Census Tract 110.

Children in Married-Couple Households

The percentage of children in married-coupled households in Coronado is similar to the percentage in the County as a whole. According to the 2021 ACS 5-Year Estimates, 22.9% of children under 18 live in married-couple families throughout the City, compared to approximately 21.2% countywide. As shown on **Figure 14. Percent of Children in Married Couple Households**, children in married-couple households primarily reside in Census Tracts 108, 111, 216, and 218, neighborhoods.

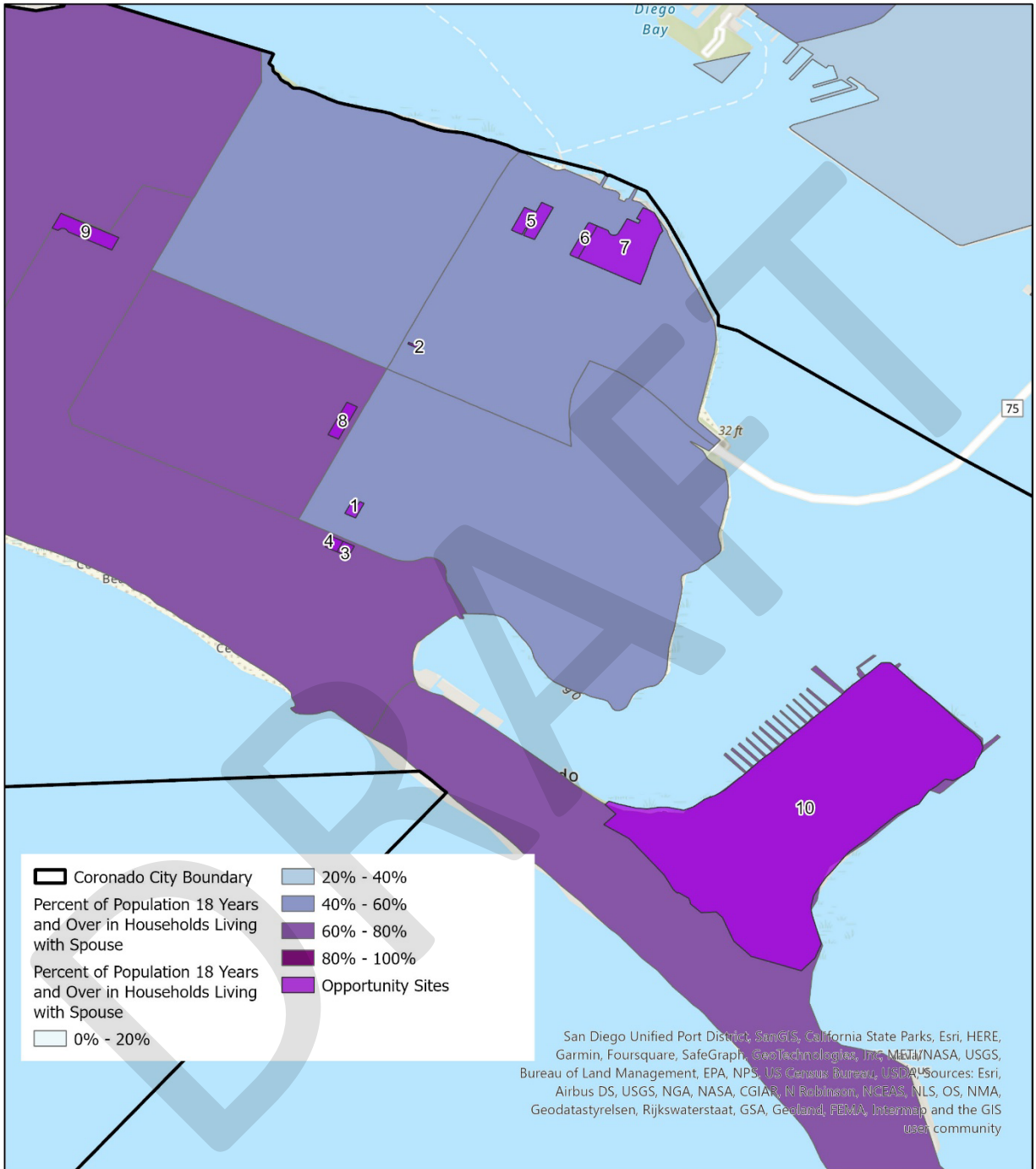
Families with children can have special housing needs due to lower per capita income, the need for affordable childcare, the need for affordable housing, or the need for larger units with three or more bedrooms. Families with children and especially teenagers may face discrimination in the rental housing market. For example, some landlords may charge large households a higher rent or security deposit, limit the number of children in a complex or unit, limit the time children can play outdoors, or choose not to rent to families with children altogether.

Children in Single Female-Headed Households

The percentage of children in single female-headed households in the City is also similar to the percentage in the County as a whole. According to 2021 ACS 5-Year Estimates, approximately 5.0% of children in Coronado under 18 and approximately 5.6% of children in the County under 18 live in female-headed households. As shown in **Figure 15. Percent of Children in Single Mother Households**, children in single female-headed households primarily reside in Census Tracts 111 and 113. However, the concentration of female-headed households does not surpass a 40% concentration.

Single-parent households require special consideration and assistance because of their greater need for daycare, healthcare, and other facilities. According to HCD, female-headed households with children tend to have lower incomes, thus limiting housing availability for this group. It is important to note that fair housing laws protect single parent households.

Figure 12. Percent of Adults Living with Spouse



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Harris & Associates

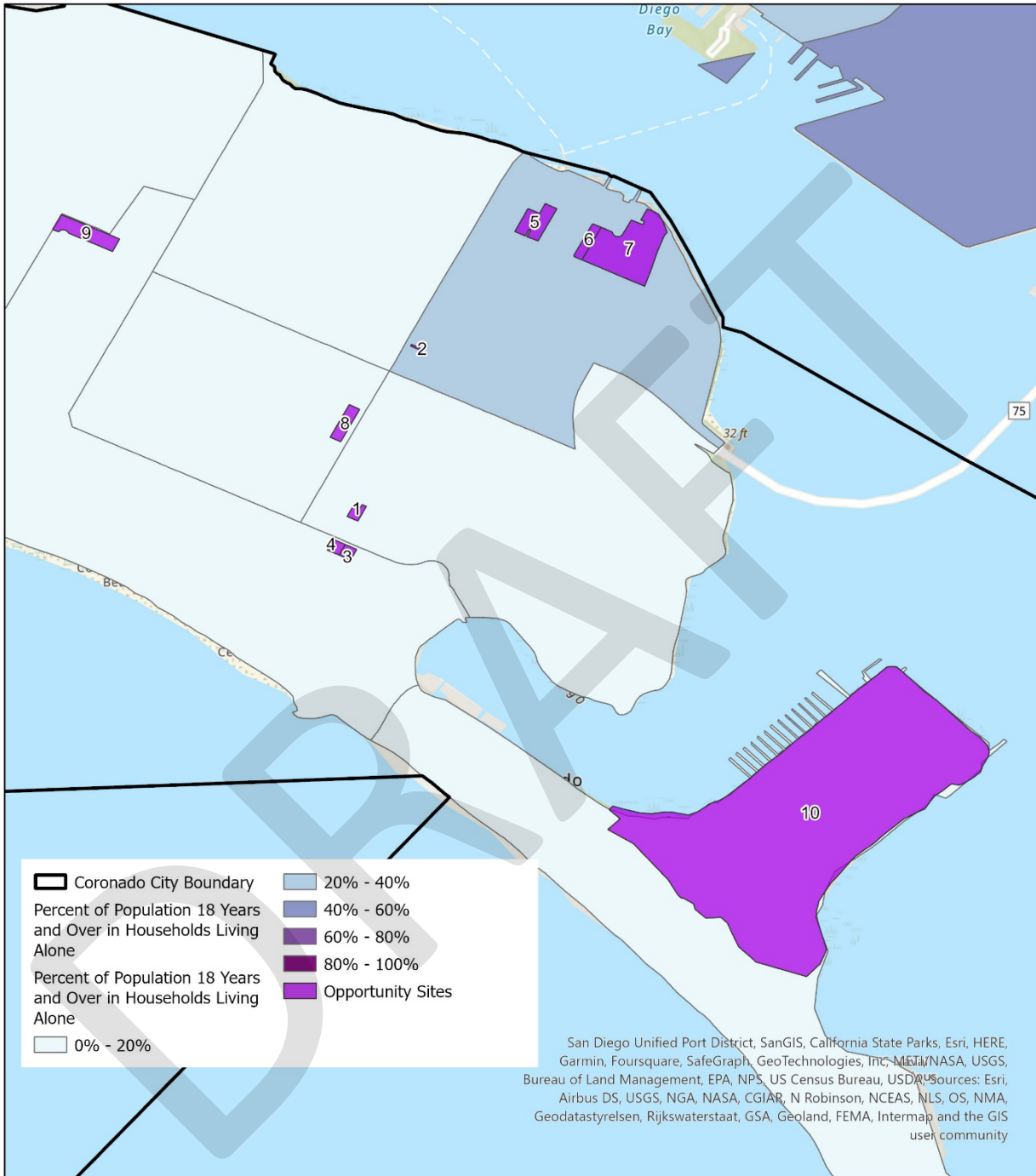


0 0.25 0.5 Miles

Percent of Adults
Living with Spouse

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Figure 13. Percent of Adults Living Alone



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Harris & Associates

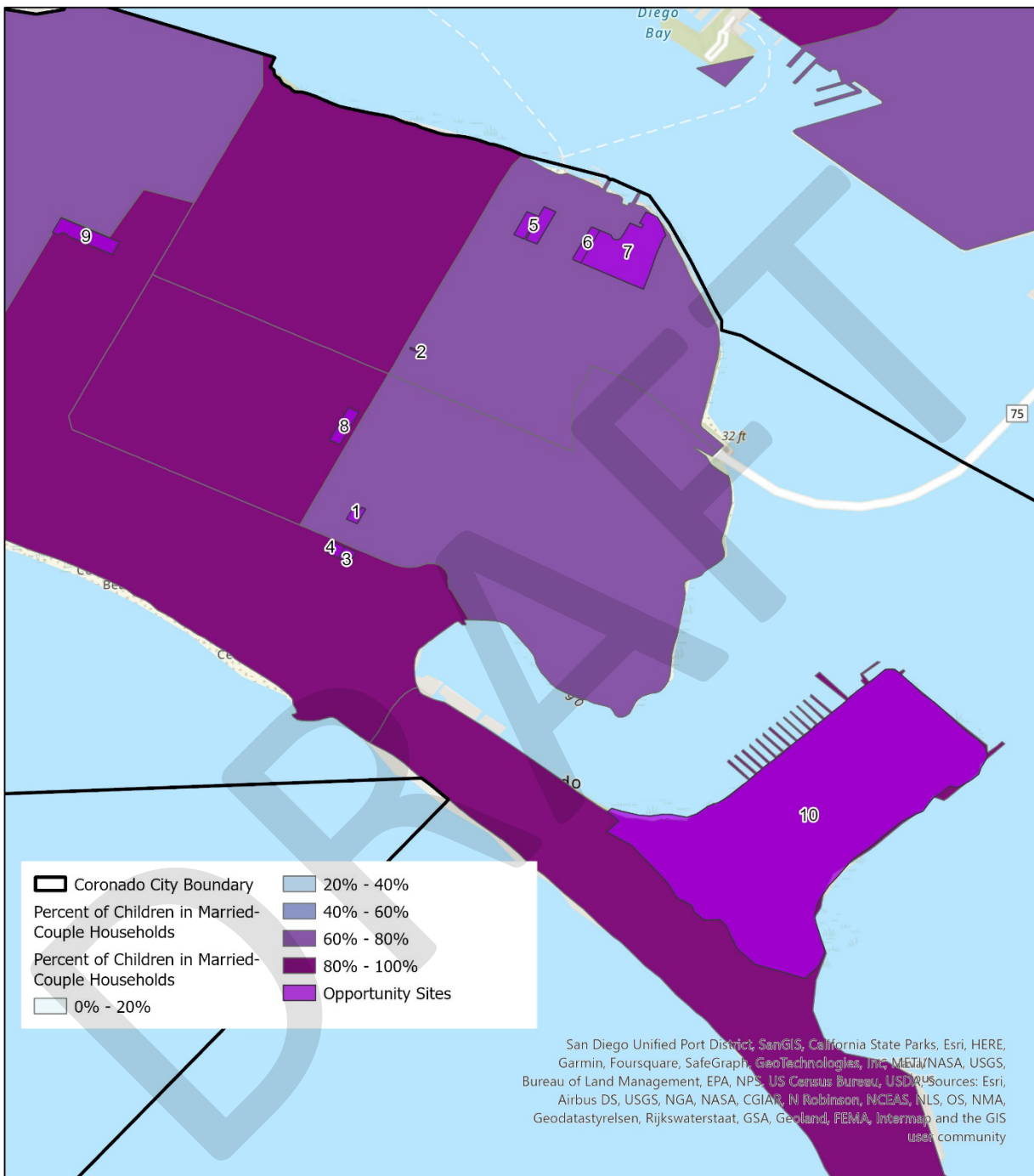


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**Percent of Adults
Living Alone**

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Figure 14. Percent of Children in Married Couple Households



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Harris & Associates

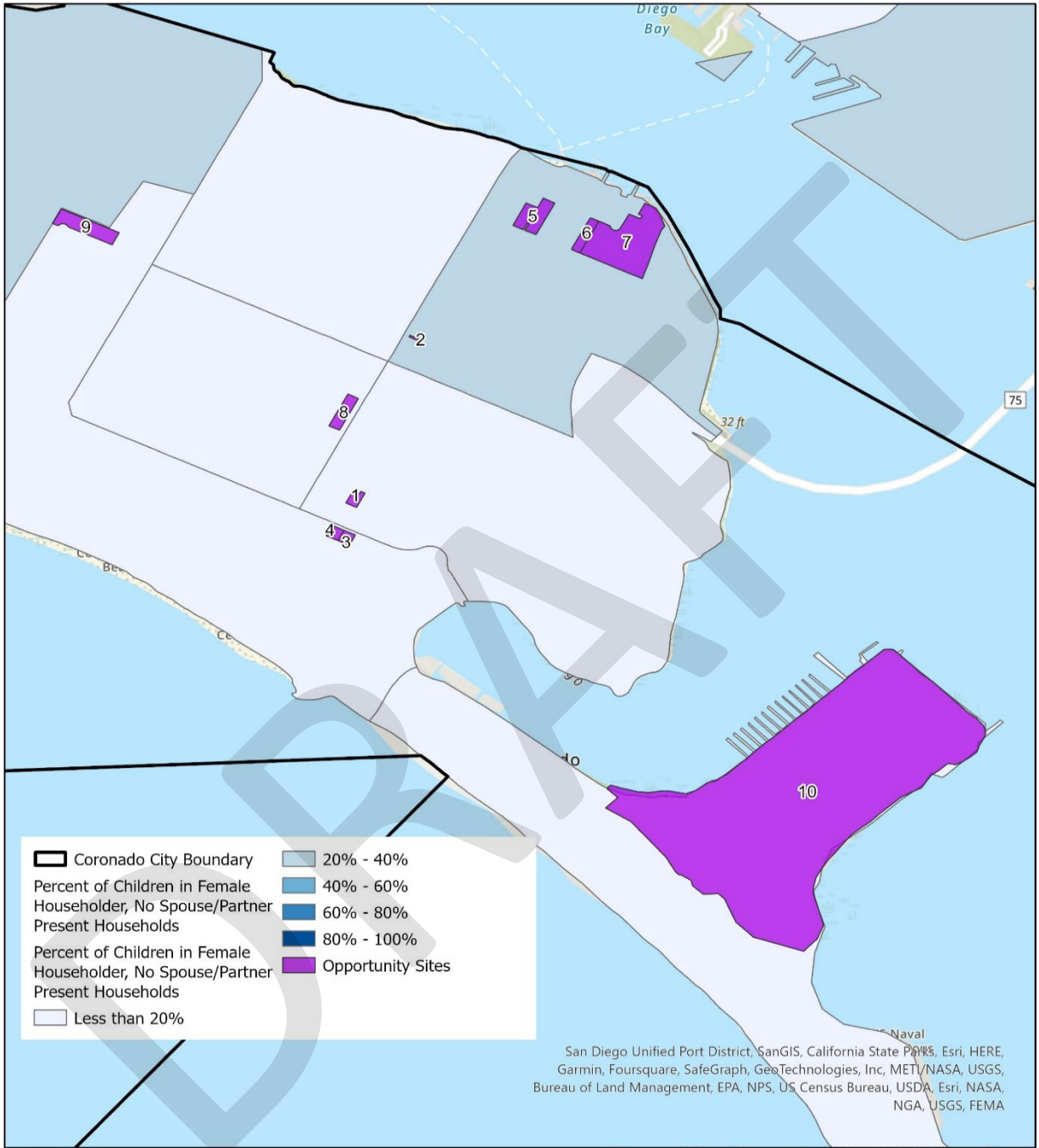


0 0.25 0.5 Miles

**Percent of Children
in Married Couple Households**

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Figure 15. Percent of Children in Single Mother Households



0 0.25 0.5 Miles

Percent of Children in Single Mother Households

City of Coronado Affirmatively Furthering Fair Housing

C. Disparities in Access to Opportunity

Access to opportunity is a concept to approximate the link between place-based characteristics (e.g., education, employment, safety, and the environment) and critical life outcomes (e.g., health, wealth, and life expectancy). Ensuring access to opportunity means both improving the quality of life for residents of low-income communities, as well as supporting residents' mobility and access to 'high resource' neighborhoods. The City is adopting the following programs to support mobility and access to housing opportunities:

- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.G:** Analysis of Impediments to Fair Housing
- **Program H-3.I:** Housing Mobility
- **Program H-3.J:** Multi-Modal Mobility Enhancement

1. Environmental Quality

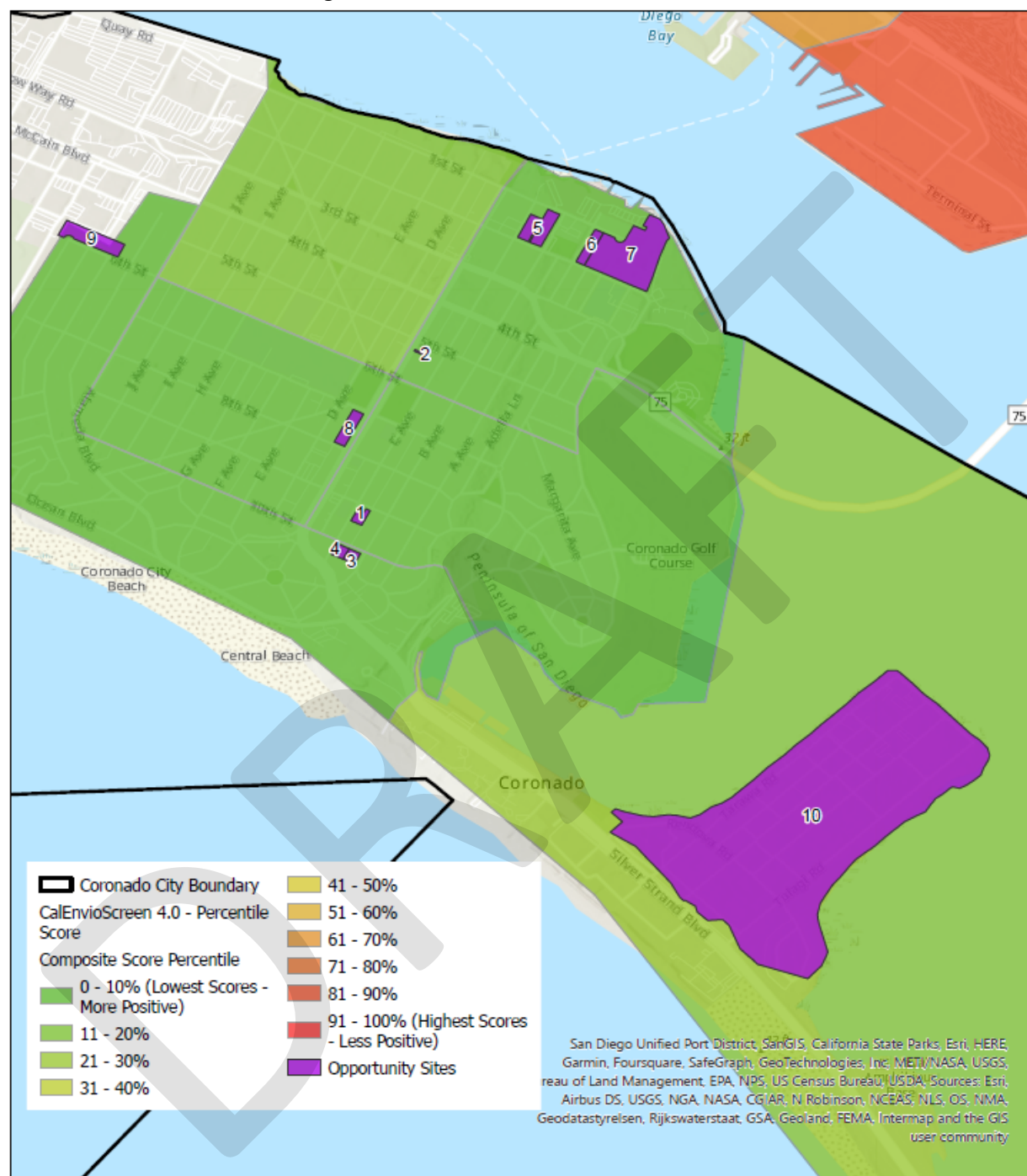
California Communities Environmental Health Screening Tool

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology called the California Communities Environmental Health Screening Tool (CalEnviroScreen) to help identify California communities disproportionately burdened by multiple sources of pollution. CalEnviroScreen takes into consideration environmental factors such as pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure, as well as sensitive receptors such as seniors, children, persons with asthma, and low birth weight infants. The methodology also considers socioeconomic factors such as educational attainment, linguistic isolation, poverty, and unemployment, as research has shown a heightened vulnerability of people of color and lower socioeconomic status to environmental pollutants. Overall CalEnviroScreen scores are calculated from the scores for two groups of indicators: Pollution Burden and Population Characteristics. The calculated average scores (average of the indicators) are divided by 10 and rounded to one decimal place for a CalEnviroScreen score ranging from 0.1 – 10. The average scores will then provide a percentile rank for how each tract ranks in comparison to tracts throughout the State. For instance, a 0.85 score indicates that the census tract scores higher than 85% of the tracts in the rest of the State. The higher the CalEnviroScreen score is, the lower exposure to the pollution characteristics described above.

As portrayed in **Figure 16. CalEnviroScreen 4.0 Percentile Score**, the entire City of Coronado has scores in the lowest percentiles, confirming that residents experience low exposures to the environmental and socioeconomic characteristics described above. **As such, all Opportunity Sites (Sites 1 through 10) in the 6th Cycle Housing Element are in extremely safe neighborhoods**, representing 489 lower-income and 158 moderate-income units (100% of the total lower-income units and 100% of the total moderate-income units).

According to the SDC 2020-25 AI, the areas indicated as having higher CalEnviroScreen scores generally match the geographic distribution of minorities, low- and moderate-income persons, and poverty concentrations throughout the County. Some of these areas scoring in the highest quartile and indicating more negative environmental factors are located near downtown San Diego and connected to Coronado via the Coronado Bay Bridge. While this area is not within the City limits, Coronado is committed to being a part of the solution. As a result, the City is adopting **Program H-2.G: Regional Collaboration on Affordable Housing** to seek partnerships and opportunities to increase housing opportunities and reduce exposure to pollution for persons in this region.

Figure 16. CalEnviroScreen 4.0 Percentile Score



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



**CalEnviroScreen 4.0
Percentile Score**

City of Coronado Affirmatively Furthering Fair Housing

2022 Sea Level Rise Vulnerability Assessment and Adaptation Plan

Recent advances in sea level rise and coastal hazard science have raised concerns about the vulnerability of the City's infrastructure and resources to changing coastal hazards. A 2021 community survey indicated that 68% of respondents are concerned about the threat of sea level rise. To address these concerns, the City of Coronado has developed the 2022 Sea Level Rise Vulnerability Assessment and Adaptation Plan (Vulnerability Assessment). This plan evaluates the vulnerability of the city's infrastructure and resources to sea level rise and outlines potential adaptation strategies to mitigate these hazards. The process involves identifying appropriate sea level rise projections, assessing risks to resources and development, developing adaptation measures, implementing these measures, and revising adaptation planning efforts over time.

The Vulnerability Assessment identifies resources, analyzes their exposure, sensitivity, and adaptive capacity to sea level rise, and assigns vulnerability scores. While the city is generally resilient to sea level rise along the open Pacific Ocean coast due to wide beaches and protective measures, it is most vulnerable along its Bay-side boundary with San Diego Bay. The Vulnerability Assessment states the following regarding sea level rise in the City:

“The geography of the City, being surrounded by water on three sides, may initially suggest high vulnerability to sea level rise in many areas; however, the Vulnerability Assessment shows that the City is resilient in many ways to future sea level rise impacts. The open Pacific Ocean coast of the City is resilient to sea level rise due its relatively wide beaches, with the notable exception in the vicinity of the Coronado Shores condominium towers. North Beach is one of the widest beaches in southern California and is anticipated to persist through all sea level rise scenarios examined, although hazard mapping analyses show large portions becoming temporarily flooded in a 100-year coastal storm event. This area further benefits from the protection provided by the sand dunes behind the beach and the rip-rap seawall along Ocean Boulevard.

The Silver Strand Beach south of the Navy SEAL training base is similarly protected by a wide sandy beach and relatively high elevation sand dunes in certain locations. The stability of the City's sandy coastline further benefits from regular nourishment events at Imperial Beach by the Port of San Diego and the sand retention functions of Zuniga Jetty at the northwest end of the coastline that forms the entrance channel to San Diego Bay. City resources are anticipated to be generally protected from shoreline erosion and tidal inundation from the Ocean-side; however, extreme storm conditions associated with the 100-year coastal storm are projected to temporarily flood the beach and portions of the City's oceanfront under more severe, long-term future sea level rise projections.

The City is most vulnerable to sea level rise along its Bay-side boundary with San Diego Bay. Vulnerability is highest where land elevations along the Bay-front are lower than the future projected high water levels within the Bay due to sea level rise, and where a buffer between San Diego Bay and development is limited.”

The Vulnerability Assessment provides a range of potential adaptation strategies, including:

- Adaptive Management:
 - Monitor sea level rise: Regularly check sea level data and act when necessary.
 - Join the Community Rating System program: Reduce flood insurance costs through enhanced floodplain management.
- Engineering:
 - Develop sea level rise design guidelines: Create rules for resilient infrastructure.
- Operational:
 - Communicate flood warnings: Provide timely information to the public.
 - Track flood locations and impacts: Collect data for prioritizing action.
 - Update emergency management plans: Ensure readiness for climate change impacts.
- Planning:
 - Participate in local and regional planning: Collaborate with regional groups.

- Seek federal and state adaptation funding: Secure grants for adaptation.
- Incentivize private building retrofits: Encourage private property owners to adapt.
- Utilize planning tools and techniques: Use zoning adjustments and transfers of development rights.
- Outreach:
 - Bolster community resilience: Enhance public understanding of climate risks and adaptation.

While the City is not currently subject to environmental hazards or flood zones, it is essential to acknowledge the potential susceptibility to flooding, particularly in light of climate change. To address this concern, the City is actively implementing mitigation measures and proactive strategies, such as the following:

City Actions to Address Environmental Health Issues

The City has taken several steps to both identify climate impacts and reduce pollutants and greenhouse gas (GHG) emissions, and prepare for a climate resilient future by completing the following:

- **Active Transportation** – The City adopted a comprehensive Active Transportation Master Plan in 2018 to address walking, cycling, and other non-motorized vehicle transportation in Coronado. In partnership with public agencies and community organizations, the City has provided Safe Routes to School education to students and parents on pedestrian, bicyclist, and traffic safety. To help reduce the negative impacts of peak travel, the City provides a free summer shuttle and a weekday commuter ferry service for pedestrians and bicyclists between the Coronado Ferry Landing and the Broadway Pier in San Diego. The City has been recognized at the Bronze level under SANDAG iCommute's Diamond Awards Program for its commuter incentive benefits, including resources for employees who use alternative transportation to get to work.
- **Climate Action Plan (CAP)** – The City adopted the CAP in 2022 and an implementation plan in 2023. The CAP outlines ways the City can reduce greenhouse gas emissions within the City to support the state's strategy. The plan documents current and ongoing sustainability efforts and provides a roadmap to further reduce greenhouse gas emissions in the future.
- **Sea Level Rise Vulnerability Assessment and Adaptation Plan** – The City approved the 2022 Sea Level Rise Vulnerability Assessment and Adaptation Plan to understand the potential effects of sea level rise and to explore possible mitigation strategies. The Vulnerability Assessment identifies areas in Coronado that are subject to projected sea level rise, rising tides, storm surge, coastal flooding, and erosion through 2100. The Adaptation Plan provides a variety of possible strategies and approaches that the City and public and private property owners can use to plan for and to address impacts identified by the Vulnerability Assessment.
- **Energy Efficiency** – The City has implemented sustainability practices within public facilities that include the installation of 14 electric charging stations throughout the City, and LEED certified public buildings such as the Animal Care Facility, Tennis Center, John D. Spreckels Senior Center, and Coronado Clubroom and Boat House. In the past three years, building permit staff have issued 288 permits for solar photovoltaic systems. In 2017, the Council approved a resolution to replace the City's gas-powered leaf blowers with zero-emission electric tools, and in 2019 the City approved an ordinance to prohibit gas-powered leaf blowers citywide.
- **Urban Forest** – The Coronado Street Tree Master Plan has a goal to plant 50 new trees every year throughout the City. The City currently maintains an extensive urban forest with over 8,500 trees and has been listed as a "Tree City USA" every year since 2014.
- **Waste Management and Recycling** – The City operates recycling programs for E-Waste, motor oil, used battery, and citywide garbage and recycling collection services.
- **Water Conservation** – Water usage in Coronado is expected to decrease from approximately 689,000 gallons to 16,000 gallons per month, resulting in a decrease of approximately \$57,500 in annual water costs. The City Water Conservation efforts include:
 - City-Operated Wastewater Recycling Plan

- Artificial Turf Hardscaping - Water conservation in the public right-of-way through fee-free permits for artificial turf hardscaping
- Golf Course Water Savings Plan
- Irrigation Efficiency - A new computer system increasing irrigation efficiency in the Recreation Department
- Cays Median Project - Conversion of turf to drought-tolerant plants in 2015.

Coronado has a long history of implementing sustainability practices, including constructing green buildings, conserving water, developing a bike and pedestrian friendly community, along with other environmentally friendly practices.

2. Economic Opportunity

Access to Public Transit

As shown in **Figure 8. Bus Stops with ½ Mile Buffer**, **nine of the 10 Opportunity Sites (Sites 1 through 9) are within ½ mile to a bus stop**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) **is outside of the ½-mile radius**. The City has several transportation options available to residents and visitors to reduce traffic and pollution, while increasing accessibility to jobs, services, and recreation. These options include:

- **MTS Bus:** The Metropolitan Transit System (MTS) operates two bus options for Coronado. Bus 901 travels off the island and into San Diego and Imperial Beach, while Bus 904 travels along Orange Ave to the Community Center and Ferry Landing.
- **Coronado Island Ferry:** The local ferry transports residents and visitors from Coronado Ferry Landing to mainland San Diego. Travelers can opt for the 5-minute ride to the Convention Center and the nearby Gaslamp District or the 15-minute ride to Broadway Pier and Seaport Village.
- **Bike Lanes:** Coronado is a pedestrian-friendly city, and many residents choose to walk or bike to their destinations. The City has two bike trails (Bayshore Trail and Coronado Bike Trail) that make up a 6-mile bike path that takes residents around the island while keeping them safe.

The City and its transit providers offer a range of transit options for Coronado residents. Public transit helps people who cannot afford personal transportation or who elect not to drive. Elderly and disabled persons also rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Many lower-income persons are also dependent on transit to go to work. Public transit that provides a link between job opportunities, public services and affordable housing helps to ensure that transit dependent residents have adequate opportunity to access housing, services, and jobs.

County Connection

The MTS was created in 1976 to provide the policy setting and overall management coordination of the public transit system in the San Diego metropolitan service area. This service area encompasses approximately three million people residing in a 570 square miles area of San Diego County, including the cities of Chula Vista, Coronado, El Cajon, Imperial Beach, La Mesa, Lemon Grove, National City, Poway, Santee, and San Diego and unincorporated areas of the County of San Diego.

As previously mentioned, there are two MTS bus routes that serve Coronado: Route 901 travels between San Diego, Coronado, and Imperial Beach; and Route 904 travels along Orange Ave., to the Community Center, to City Hall and to the Bayfront and Ferry Landings.

Free Summer Shuttle

Starting in 2013, the City of Coronado began operating a free summer shuttle which runs from Memorial Day through Labor Day. It operates a Village Bus Shuttle at 15-minute intervals along the existing MTS 904 route.

Ferry Service

The City receives funds from the federal Transportation Development Act to subsidize a free commuter ferry between San Diego and Coronado. The 15-minute ferry ride connects Coronado to two San Diego locations- Broadway Pier and the Convention Center. As of 2018, children aged three and under are free to ride. The ferry is accessible to wheelchairs and bicycles are permitted free of charge. The ferry service creates a connection to downtown San Diego, allowing Coronado residents to commute to destinations downtown and beyond without a car. It also allows visitors a car-free trip to Coronado, making the connections with the MTS bus routes and active transportation networks all the more important.

MTS Access and Paratransit

The MTS operates a fixed route bus and light rail system using ramp or lift equipped vehicles in full compliance with the Americans with Disabilities Act (ADA). All MTS buses and trolleys are equipped with features that provide system accessibility, such as low floor easy to board buses and trolleys equipped with lifts/ramps, audio announcements, designated priority seating areas for people with disabilities, enhanced signage, kneeling buses, and handrails. To be certified for MTS Access, prospective riders must complete an application process for ADA certification. MTS will make one of the following determinations about each applicant within 21 days:

- **Unconditional:** Individuals who cannot travel independently due to severe or profound intellectual disabilities or individuals with physical disabilities who have limited functional ability who are unable to board, ride, disembark, or understand the fixed route bus and trolley system under all circumstances.
- **Conditional:** Individuals with disabilities who have learned how to make certain trips on fixed routes but cannot make all trips independently on fixed route. Individuals with physical disabilities who can reach a bus stop or rail station within four blocks when the route is accessible.
 - **Temporary:** Individuals whose disability may improve over time or with treatment and then can use the fixed route system.
 - **Ineligible:** Individuals who indicate or demonstrate they have the functional ability to board, ride, disembark, and understand the fixed route bus and trolley system under all circumstances.

MTS Access provides complementary paratransit service that is comparable to the level of MTS fixed route service for those riders who have been certified as unable to use fixed route service. MTS Access service is offered within a ¼ mile radius of a nearby bus route and/or trolley station, and is available during the same hours and days, including on holidays, as the MTS fixed route system.

In 2023, MTC has launched the following pilot programs to help improve transit access for eligible riders.

- Expand the reservation window from two days prior to a trip to 10 days prior to a trip, as an effort to allow greater flexibility in scheduling trips.
 - MTS/First Transit will provide pre-scheduled trips for ambulatory Access riders. All operators will be pre-screened to ensure proper training on MTS Access policies and service quality expectations.

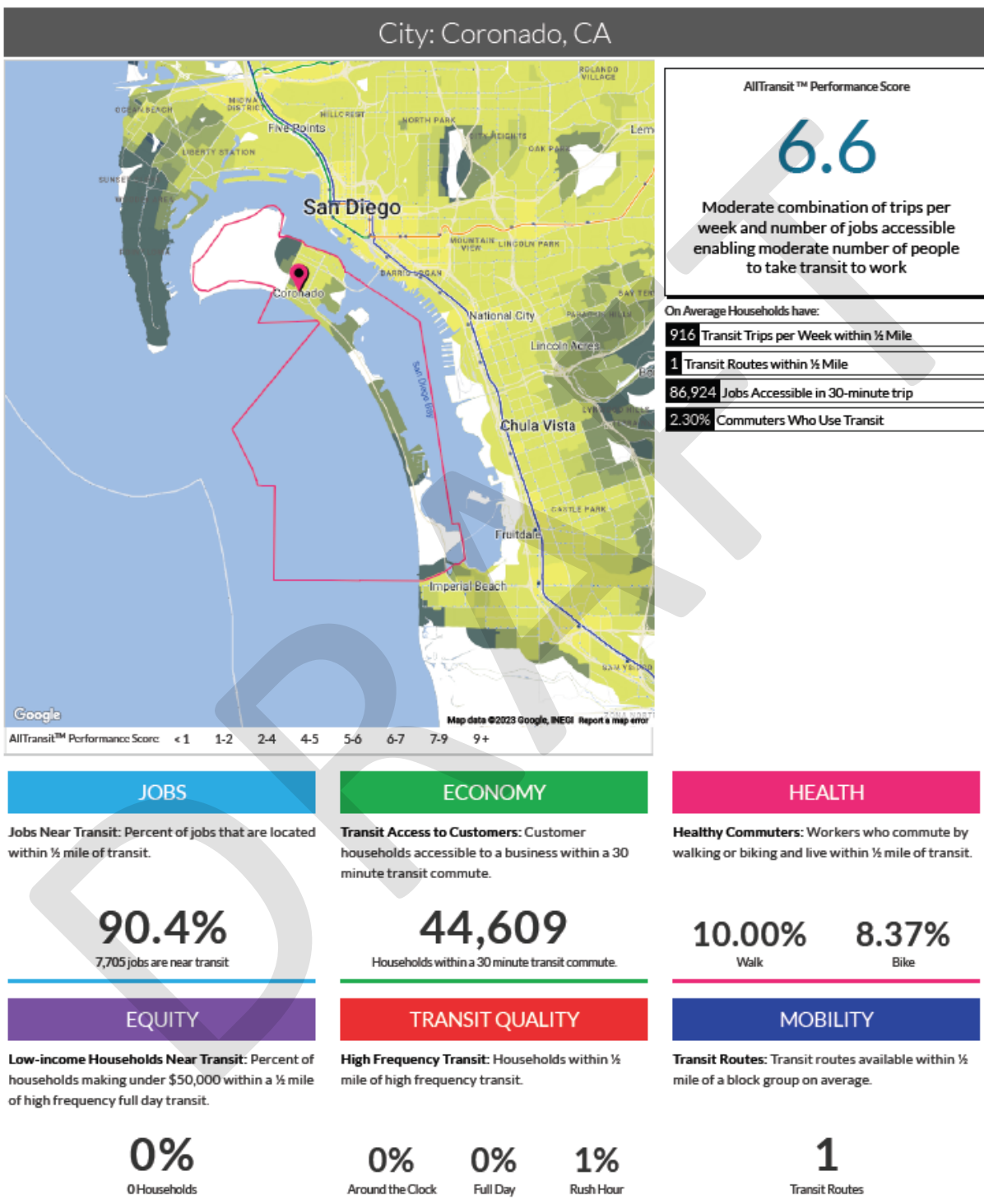
AllTransit Performance Scores

AllTransit is a data repository managed by the Center for Neighborhood Technology, an award-winning innovations laboratory for urban sustainability. AllTransit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service.

The City's AllTransit performance score is 6.6, illustrating a moderate combination of trips per week and number of jobs accessible that enable a moderate number of people to take transit to work. By comparison, Coronado scored

higher than San Diego County (5.3). As shown in **Figure 17. AllTransit Performance Score Map- Coronado**, eight of the 10 Opportunity Sites (Sites 1 through 8), representing 117 lower income and 55 moderate income units (23.9% of the total lower income units and 34.8% of the total moderate income units), are within the highest AllTransit Performance Score Areas. The scores in these areas range from 6-9+. **Figure 8. Bus Stops with ½ Mile Buffer** illustrates the areas of the City that are within a half-mile of a bus stop or major highway. Specifically, nine of the 10 Opportunity Sites (Sites 1 through 9) are within ½ mile to a bus stop, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). The remaining Site 10, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) is outside of the ½-mile radius.

Figure 17. AllTransit Performance Score Map- Coronado



Active Transportation Master Plan

The City adopted the Active Transportation Master Plan (ATMP) in 2018 to lay the foundation for improving pedestrian and bicycle conditions within Coronado. The ATMP provides an update to the 2011 City of Coronado Bicycle Master Plan and builds on recommendations in the 2001 Coronado Safe Routes to School Plan. The policies and programs identified in the ATMP not only support walking and bicycling to further enhance mobility, but to improve the quality of life on Coronado, create a more sustainable environment, and reduce traffic congestion, vehicle exhaust, and noise. The following objectives center around the 5 E's - engineering, education, encouragement, enforcement, and evaluation.

- Develop and maintain safe, convenient, and connected networks for people of all ages walking or biking within the City.
- Facilitate educational programs to teach children and adults safe walking and bicycling behaviors and educate motorists on sharing the road respectfully and appropriately.
- Encourage walking and biking for daily transportation and recreation throughout Coronado.
- Enforce current traffic laws to educate motorists and cyclists for the purpose of maximizing safety.
- Monitor pedestrian and bicycle safety efforts in the City of Coronado to gauge effectiveness and improve program outcomes.

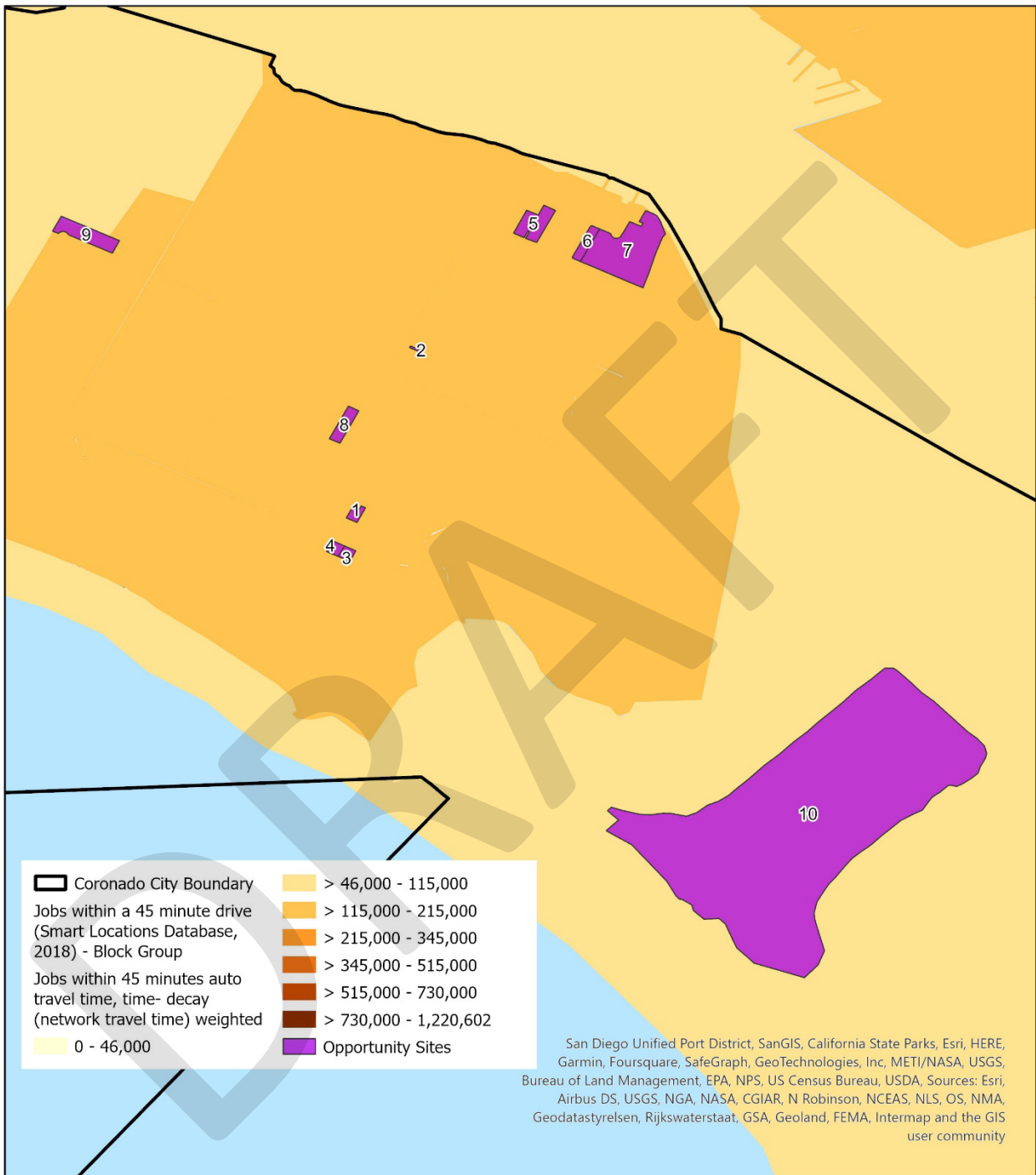
Proximity to Jobs

The AFFH 2.0 Data Viewer provides the number of jobs within a 45-minute drive and a 45-minute transit ride based on the EPA Smart Location database. The Smart Location Database summarizes more than 90 different indicators associated with the built environment and location efficiency. Indicators include density of development, diversity of land use, street network design, and accessibility to destinations as well as various demographic and employment statistics.

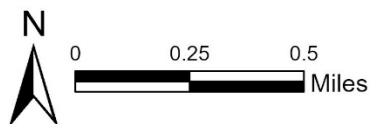
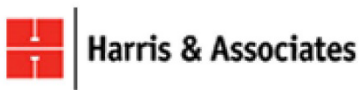
According to the AFFH 2.0 Data Viewer, the number of jobs available within a 45-minute drive for most of Coronado are consistent with trends across the County. As shown on **Figure 18. Jobs within 45 Minute Drive Time**, **nine of the 10 Opportunity Sites (Sites 1 through 9) are in areas with the number of jobs as high as 215,000 jobs within a 45-minute drive**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) **is in an area with up to 115,000 jobs within a 45-minute drive. It is important to note that persons housed on Site 10 will all be employed by the Navy.**

Furthermore, according to the AFFH 2.0 Data Viewer, the number of jobs available within a 45-minute transit ride for most of Coronado is higher in the central portion of the City, where the Coronado Bay Bridge connects Coronado to the City of San Diego. As shown in **Figure-19. Jobs within 45 Minute Transit Ride**, **nine of the 10 Opportunity Sites (Sites 1 through 9) are located within a 45-minute transit ride of up to 100,000 jobs**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) **is in an area with up to 50,000 jobs within a 45-minute transit ride.**

Figure 18. Jobs within 45 Minute Drive Time



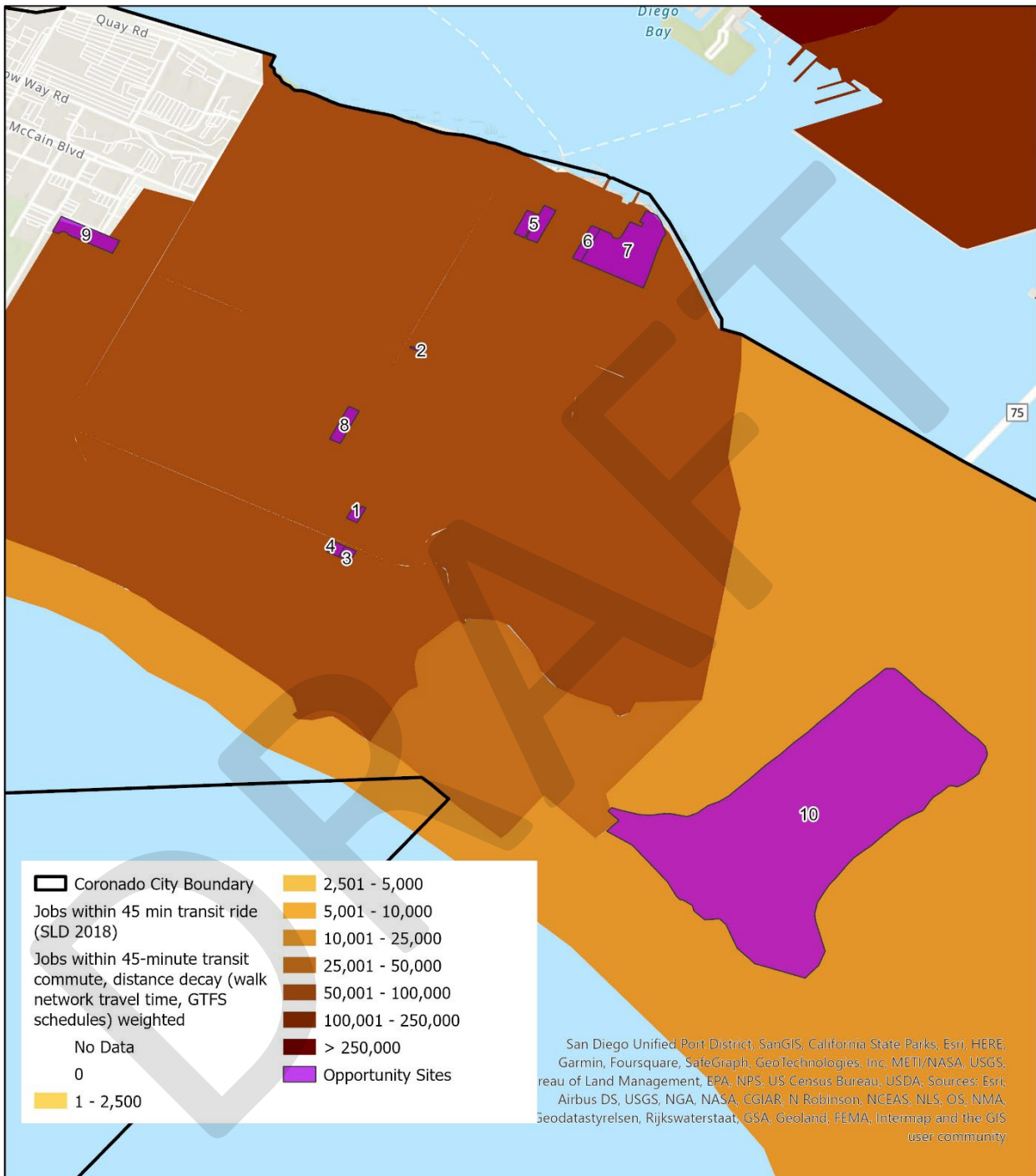
Source: City of Coronado, HCD AFFH 2.0 Data Viewer



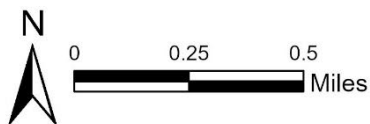
Jobs within 45 Minute Drive Time

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Figure-19. Jobs within 45 Minute Transit Ride



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Jobs within 45 Minute Transit Ride

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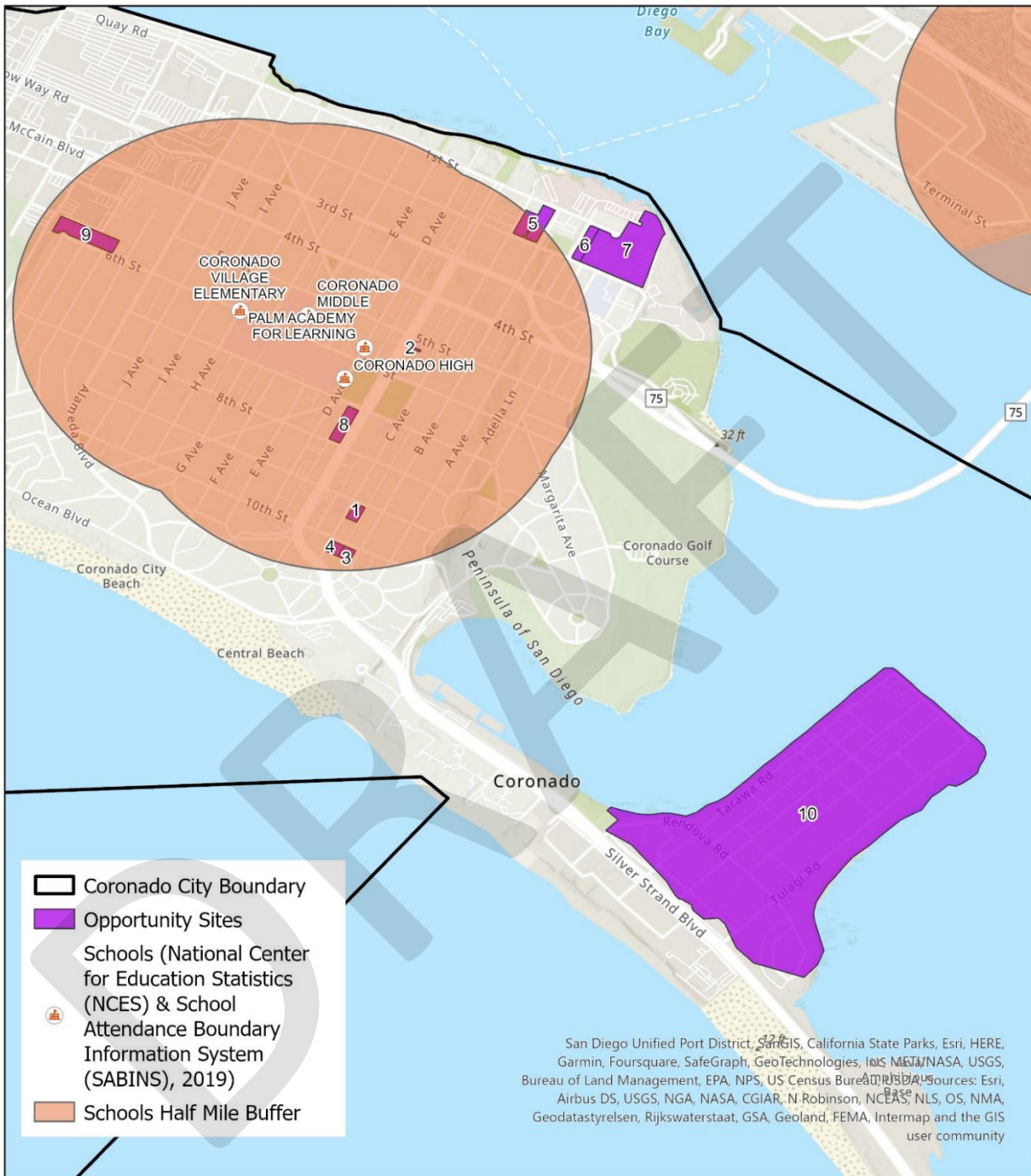
Educational Access

The City of Coronado is served by the Coronado Unified School District, and includes two elementary schools, a middle school and a high school. All of the schools are considered high-quality, according to School-Ratings.com, with ratings distributed from the 84th to the 92nd percentiles. The City of Coronado has one Title I school, Silver Strand Elementary, which helps low-achieving children meet state standards in core academic subjects. These schools coordinate and integrate resources and services from federal, state, and local sources. To be considered for Title 1 school funds, at least 40 percent of the students must be considered low-income. It is important to note that this school serves a large population of children in military families that live in the adjacent Lincoln Military Silver Strand Housing.

Moreover, the TCAC/HCD Opportunity Areas Map provides an Education Domain Index score on a scale from 0 – 1 analyzing various education factors. Three of the schools in the City have more positive outcomes with an average Education Domain Index score of 0.55, and one has a score of 0.48 - the lowest score in the City. For reference, the County average Education Domain Index score was 0.50.

Finally, as shown in **Figure-20. Schools with ½ Mile Buffer, seven of the 10 Opportunity Sites** (Sites 1 through 5 and 8 through 9), representing 157 lower income and 34 moderate income units (32.1% of the total lower income units and 21.5% of the total moderate income units), **are within ½ mile of a school**. However, as shown in **Figure 8. Bus Stops with ½ Mile Buffer**, all but one (Site #10) of the Opportunity Sites are within ½ mile to a high quality bus stop and the City has numerous transportation options available to residents and visitors to increase accessibility to public services such as schools.

Figure-20. Schools with ½ Mile Buffer



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



0 0.25 0.5
Miles

Schools with Half Mile Buffer

City of Coronado Affirmatively Furthering Fair Housing

3. Opportunity for Persons with a Disability

Population with a Disability

According to 2021 ACS 5-Year Estimates, the percentage of population with one or more disabilities in Coronado is 10.1%, while that of the County is 10%. **Figure 21. Population with a Disability**, illustrates the concentration of residents with a disability in the City of Coronado. As shown in **Figure 21**, seven of the eight census tracts in Coronado have concentrations of residents with a disability below 10%. The remaining census tract is Census Tract 111 and has a concentration of residents with a disability ranging between 10% - 20%. It must be noted that **all 10 Opportunity Sites (Sites 1 through 10) are located in census tracts with a concentration of residents with a disability below 10%**, representing 489 lower-income and 158 moderate-income units (100% of the total lower-income units and 100% of the total moderate-income units).

The ADA defines a disability as a “physical or mental impairment that substantially limits one or more major life activities.” Fair housing choice for persons with disabilities can be compromised based on the nature of their disability. Persons with physical disabilities may face discrimination in the housing market because of the use of wheelchairs, the need for home modifications to improve accessibility or other forms of assistance. Landlords/owners sometimes fear that a unit may sustain wheelchair damage or may refuse to exempt disabled tenants with service/guide animals from a no-pet policy. A major barrier to housing for people with mental disabilities is opposition based on the stigma of mental disability. Property owners often refuse to rent to tenants with a history of mental illness. Neighbors may object when a house becomes a group home for persons with mental disabilities.

People with disabilities are not only in need of affordable housing, but also can require accessibly designed housing to provide greater mobility and opportunity for independence. Unfortunately, the need typically outweighs what is available, particularly in a housing market with such high demand. People with disabilities are at a high risk for housing insecurity, homelessness, and institutionalization, particularly when they lose aging caregivers. Special housing needs for persons with disabilities generally fall into two general categories:

- Physical design to address mobility impairments.
- In-home social, educational, and medical support to address developmental and mental impairments.

The City will implement the following programs to support housing opportunities for people with disabilities:

- **Program H-1.B:** Technical Assistance to Developers
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing

Disability and Access in San Diego County

The Persons with Disabilities section of the SDC 2020-25 AI provides an overview of the population with a disability and access to housing opportunities and public services. The SDC 2020-25 AI states that although disabled persons are geographically dispersed throughout the more urbanized areas of the County, there are significant areas with a high density of residents with a disability that coincide with minority concentration areas and RECAPs. Specifically, concentrations of residents with a disability can be seen in the northern cities, as well as the southern areas of the City of San Diego, which is connected to Coronado via the Coronado Bay Bridge. The coastal and inland areas show less dense concentrations of residents with disabilities, which could be due to the high price of housing (in the coastal areas) or the scarcity of facilities and services for persons with disabilities (inland areas).

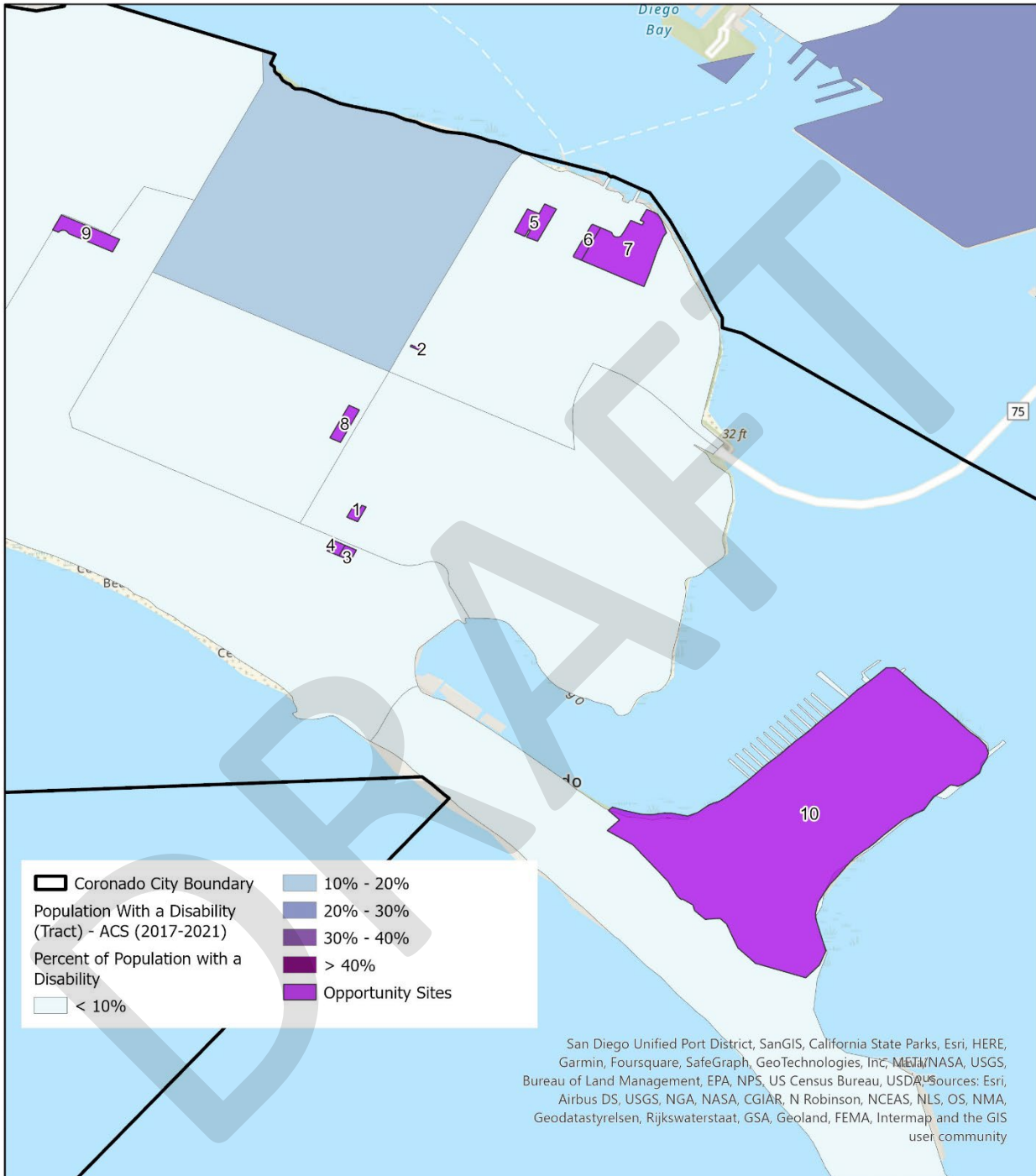
According to the SDC 2020-25 AI, the senior population has a significantly larger percentage of all disability types, and the County’s senior population will grow substantially in the next 20 years. Since seniors have a much higher

probability of having a disability, the housing and service needs for persons with disabilities should grow considerably, commensurate with the projected growth of this population.

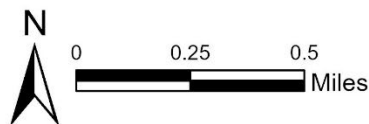
Community integration efforts in California for individuals who are at risk of unjustified institutionalization, particularly including persons with intellectual and developmental disabilities and persons with psychiatric disabilities, are further along than they are in most states. This is due to the ambitious use of Medicaid waivers and the availability of funds for permanent supportive housing through the Mental Health Services Act, as well as the recent implementation of the No Place Like Home program, which dedicates up to \$2 billion in bond proceeds to the development of permanent supportive housing. Nonetheless, there are unmet needs for wraparound supportive services for persons with psychiatric disabilities and for permanent supportive housing for persons with intellectual and developmental disabilities.

In San Diego, specifically, the San Diego Regional Center provides a range of services to persons with or affected by developmental disabilities. Services include diagnostic and eligibility assessments, program planning, case management, and other services and supports. The San Diego Regional Center has four offices in the County and is one of 21 non-profit regional centers in California providing lifelong services and support for people with developmental disabilities residing in San Diego and Imperial Counties. As of June 2018, the Regional Center had just over 27,000 clients living in San Diego County. The ARC of San Diego, one of the largest, most comprehensive service providers for people with intellectual and developmental disabilities in San Diego County, and Community Interface Services, a non-profit organization that provides services to children and adults with developmental disabilities, offer comprehensive services for persons or individuals with developmental disabilities and their families, including diagnosis, counseling, coordination of services, advocacy, and community education/training.

Figure 21. Population with a Disability



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Population with a Disability

City of Coronado Affirmatively Furthering Fair Housing

4. Summary of San Diego County Access to Opportunity

As a composite, the AFFH 2.0 Data Viewer, and other local data show that:

- Access to opportunity is highest for non-Hispanic Whites in San Diego County. The various report measurements show that County neighborhoods with the most Whites, and Coronado in particular, have significant access to opportunity.
- Access to opportunity is lowest for non-Hispanic Black people and Hispanics. The AFFH 2.0 Data Viewer shows the RECAPs in San Diego County in census tracts with Hispanics as the predominant population and RCAAs in census tracts with Whites as the predominant population.

Geographic trends are also evident. As shown in the AFFH 2.0 Data Viewer, access to opportunities have the following trends:

- RECAPs in San Diego County are concentrated in the central areas of the County with the highest concentration of Hispanics.
- RCAAs are located in the coastal regions, such as Coronado, and the areas north (north coastal region) and east (inland region) of the central zone.

Furthermore, the SDC 2020-25 AI provides an overview of access to opportunities, with a focus on access to public transit and employment. Key findings are summarized below.

- **Public Transit:** Public transit providers serve large portions of the western side of the County. In particular, transit use is higher in parts of the region where the greatest investment in transit service has been made: the north coastal, central, and south bay regions of the County. Many affordable housing projects are located in close proximity to regional transit routes, with the exception of the eastern portions of the County, where few assisted units are located.
- **Major Employers:** The San Diego County population and employment growth rates typically correlate to national economic cycles and are sensitive to military spending. Major employers, organizations with the largest number of employees, are mostly located throughout the Central Coastal and South Bay sub-regions of San Diego County. Major employers in the region include colleges, university campuses, military, federal and state government, and hospitals and medical centers. Because of its location along the Mexican border and adjacent to the Pacific Ocean, international trade is a major economic strength for the region. The border between San Diego and Mexico is the busiest in the world and the San Diego Port contributes a significant number of jobs to the region.

Moreover, the SDC 2020-25 AI provided an analysis on disparities in access to opportunity using HUD-provided index scores that are based on nationally available data sources and assess residents' access to key opportunity assets in San Diego County. These indices are only available to Entitlement Jurisdictions (with population over 50,000 and receiving CDBG funds from HUD). Key findings are summarized below.

- 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 rate.
- Black residents were most likely to reside in areas with the lowest environmental quality levels, the lowest accessibility to employment centers, and the lowest cost of transportation.
- Black and Asian residents scored highest as most likely to utilize public transportation.

5. Overcrowding

Some households may not be able to accommodate high-cost burdens for housing but may instead accept smaller housing or reside with other individuals or families in the same home. Potential fair housing issues emerge if non-traditional households are discouraged or denied housing due to a perception of overcrowding.

Household overcrowding is considered reflective of various living situations:

- A family lives in a home that is too small.
- A family chooses to house extended family members.
- Unrelated individuals or families are sharing one housing unit.

Not only is overcrowding a potential fair housing concern, but it can also strain physical facilities and the delivery of public services, reduce the quality of the physical environment, contribute to a shortage of parking, and accelerate the deterioration of homes. To address the concern, the Housing Plan contains **Program H-2.L: Housing Choices**.

According to 2021 ACS 5-Year estimates, the percentage of overcrowded housing units in the City is lower than in the County and thus overcrowding is not a significant issue. More specifically, 1.2% of housing units in Coronado meet the ACS definition of “overcrowding,” while the County has an overcrowding rate of 7%.

6. Housing Cost Burden

Cost Burden among Renters

The rent cost burden in the City is similar to that in the County as a whole. More specifically, according to the 2021 ACS 5-Year Estimates, 57.2% of renters in Coronado experience rent cost burden while the percentage in the County is 56.7%. **Figure 22. Overpayment by Renters** shows the concentration of rent-burdened households in the City.

Nine of the 10 Opportunity Sites (Sites 1 through 7, 9 and 10) are in census tracts with a concentration of 40% to 80% of renters overpaying for housing, representing 442 lower-income and 158 moderate-income units (90.0% of the total lower-income units and 100.0% of the total moderate-income units). **The remaining Opportunity Site (Site 8)**, representing 47 lower-income units and zero moderate-income units (10.0% of the total lower-income units and 0.0% of the total moderate-income units), **is in a census tract with a concentration of 20% to 40% of renters overpaying for housing**.

The highest concentration of renters overpaying for housing are in Census Tract 216 with 60% - 80% of residents paying over 30% of their household income in rent. In addition, four census tracts have significant concentrations of cost burdened residents (40%-60%), including Census Tracts 109, 110, 111, and 218.

In order to address this issue, the City is proposing the following programs:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations

- **Program H-3.I:** Housing Mobility
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.D:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Processes
- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

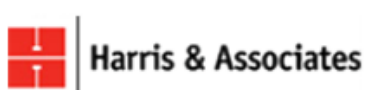
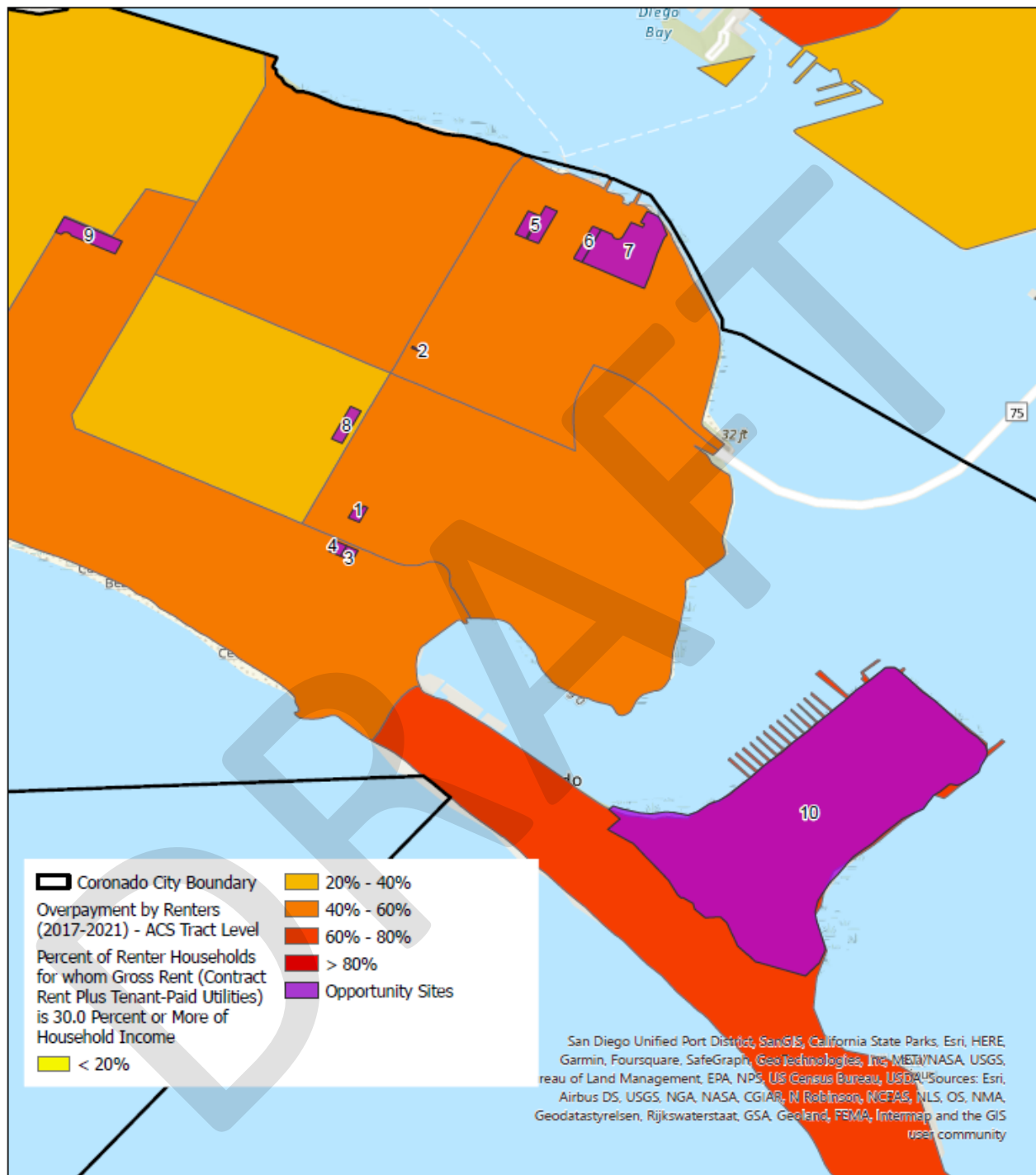
Cost Burden among Owners

A higher percentage of homeowners in the City are cost-burdened than in the County as a whole. More specifically, according to the 2021 ACS 5-Year Estimates, 50.8% of City homeowners are cost-burdened while the percentage in the County is 38.8%. Six of the **10 Opportunity Sites, (Sites 1 through 2, 5 through 7, and 10) are in census tracts with a concentration of 40% to 80% of renters overpaying for housing**, representing 369 lower-income and 124 moderate-income units (75.5% of the total lower-income units and 78.5% of the total moderate-income units). **The remaining Opportunity Sites (Sites 3,4, 8 and 9), representing 120 lower-income units and 34 moderate-income units (24.5% of the total lower-income units and 21.5% of the total moderate-income units), are in a census tract with a concentration of 20% to 40% of renters overpaying for housing.** Figure 23 - Overpayment by Owners shows the concentration of cost-burdened households in the City. The highest concentration of homeowners overpaying for housing are in Census Tract 216 with 60% - 80% of residents paying over 30% of their household income in housing costs. In addition, three more census tracts have significant concentrations of cost burdened residents (40%-60%). The three census tracts include Census Tracts 109, 110, and 111.

In order to address this issue, the Housing Plan contains the following programs:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations
- **Program H-3.I:** Housing Mobility
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.D:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Process
- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

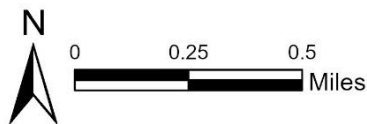
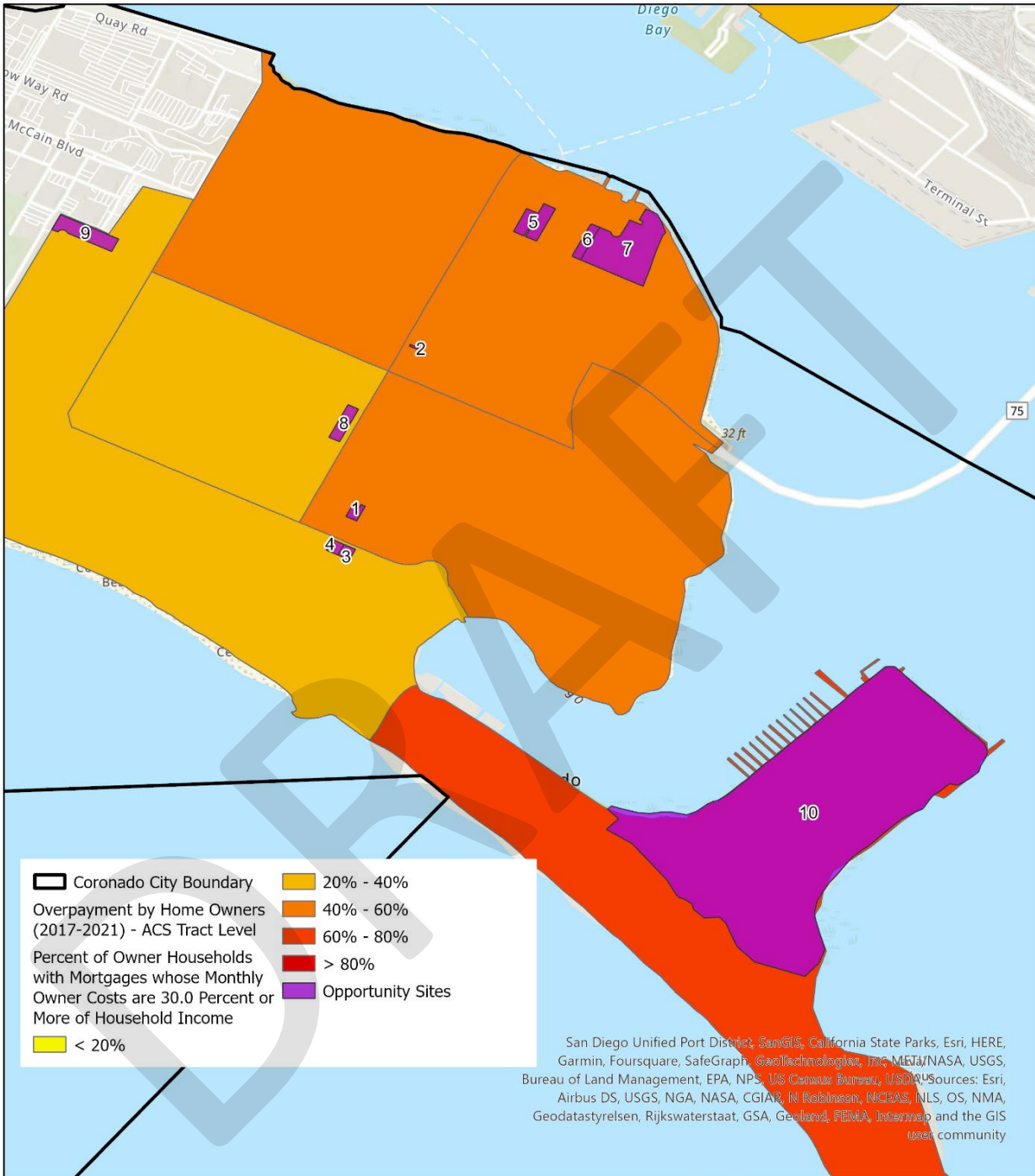
Figure 22. Overpayment by Renters



Overpayment by Renters

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Figure 23. Overpayment by Owners



Overpayment by Owners

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Displacement Risk in Coronado

Displacement occurs when housing costs or neighboring conditions force current residents out and rents become so high that lower-income people are excluded from moving in. Because of increasing housing prices, displacement is a major concern throughout the region. Displacement has the most severe impacts on low- and moderate-income residents. When individuals or families are forced to leave their homes and communities, they also lose their support network.

The Urban Displacement Project (UDP) is a research and action initiative of the University of California Berkeley and the University of Toronto and 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 research project, the UDP identifies sensitive communities as those that have neighborhoods with a high proportion of residents vulnerable to displacement in the case of rising housing costs and market-based displacement pressures present in and/or near the community.

According to research from the University of California, Berkeley, much of Coronado is designated as Low Displacement Risk. As shown in **Figure 24. Estimated Displacement Risk Overall**, five census tracts in the City have a low risk of displacement, while the rest do not have sufficient quality data. The five census tracts include Census Tracts 108, 109, 110, 111, and 218.

Furthermore, **Figure 24** shows that **nine of the 10 Opportunity Sites (Sites 1 through 9) are located in areas designated as Low Displacement Risk**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units), **is in a census tract with low-quality data.**

Despite the City’s low displacement risk, the census tracts across the San Diego Bay, extending from the cities of San Diego to Imperial Beach, are designated as Elevated, High, or Extreme Displacement Risk (the highest scores possible).

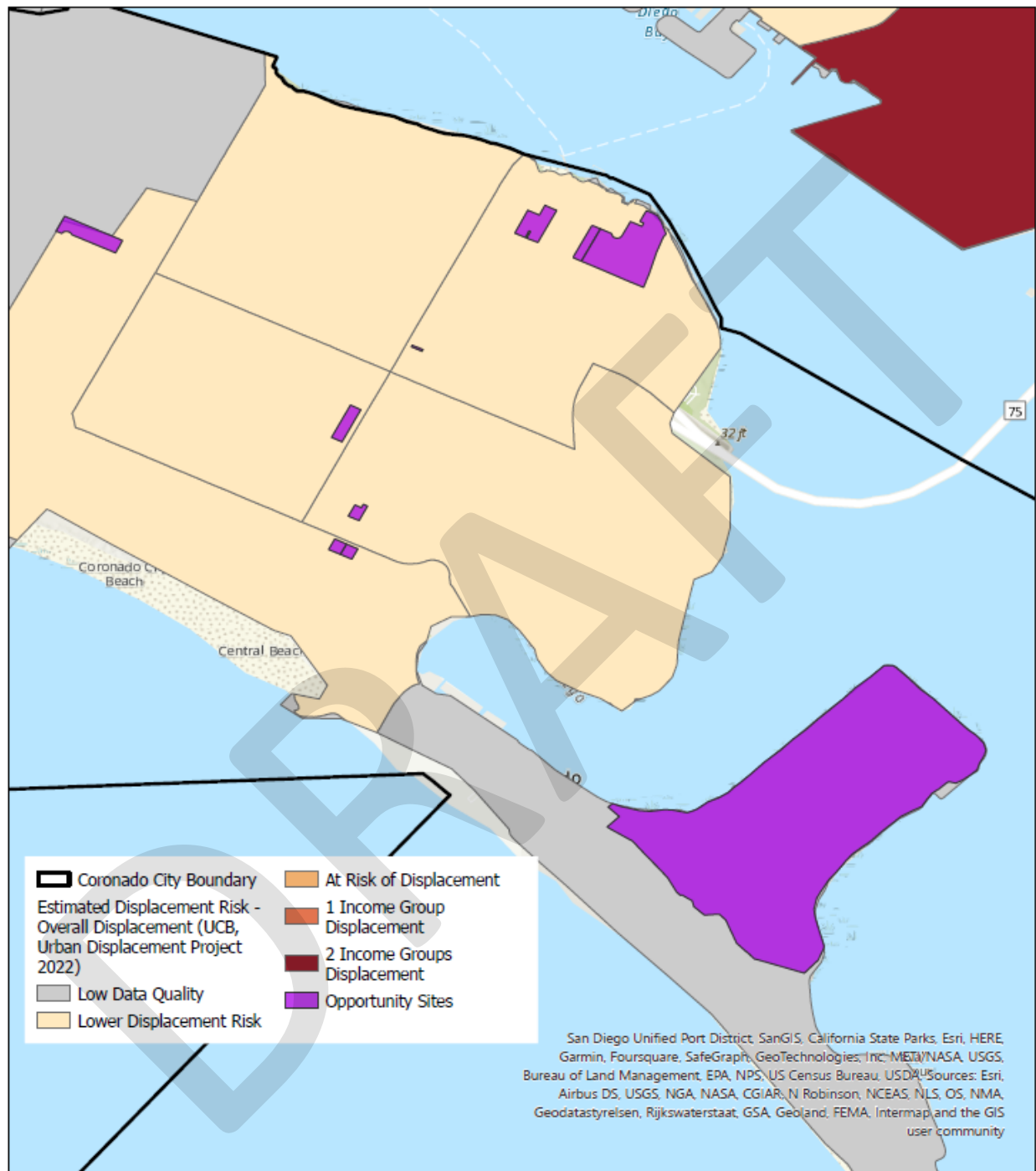
There are various ways to address displacement, including ensuring new housing at all income levels is built. In order to take a proactive approach on the issue of displacement for both Coronado and its neighboring communities, the Housing Plan contains the following programs:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
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- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations

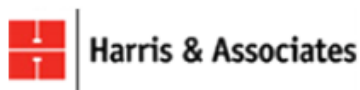
- **Program H-3.I:** Housing Mobility
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.D:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Process
- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

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Figure 24. Estimated Displacement Risk Overall



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



0 0.25 0.5 Miles

Estimated Displacement Risk Overall

City of Coronado Affirmatively Furthering Fair Housing

D. Discussion of Disproportionate Housing Needs

The Affirmatively Furthering Fair Housing Guidance for All Public Entities and for Housing Elements published by HCD in 2021 defines “disproportionate housing needs” as:

“a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.”

The analysis is completed by assessing cost burden, severe cost burden, overcrowding, substandard housing, and homelessness. Many housing problems such as housing overpayment or overcrowded housing are directly related to the cost of housing in a community. If housing costs are high relative to household income, a correspondingly high prevalence of housing problems occurs. This section evaluates the disproportionate housing need and displacement risk.

Table 3. Impacts on Patterns of Disproportionate Housing Needs, provides an Opportunity Sites summary of the number of units by income group for each of the AFFH categories relative to the impacts on patterns of disproportionate housing needs.

1. Overpayment/Cost Burden

According to the federal government, overpayment is considered any housing condition where a household spends more than 30% of income on housing. A cost burden of 30% to 50% is considered moderate overpayment; payment in excess of 50% is considered severe overpayment. Overpaying is an important housing issue because paying too much for housing leaves less money available for emergency expenditures.

The analysis evaluates the number of units in the Opportunity Sites that are in areas where the majority (more than 50%) of households experience housing cost burden. Cost burden is defined as having over 30% of a household’s income go towards rent and utilities each month. As shown in **Figure 22. Overpayment by Renters, of the 10 Opportunity Sites, nine (Sites 1 through 7 and 9 through 10) are in census tracts with a concentration of 40% to 80% of renters overpaying for housing**, representing 442 lower-income and 158 moderate-income units (90.0% of the total lower-income units and 100.0% of the total moderate-income units). **The remaining Opportunity Site (Site 8), representing 47 lower-income units and zero moderate-income units (10.0% of the total lower-income units and 0.0% of the total moderate-income units), is in a census tract with a concentration of 20% to 40% of renters overpaying for housing.**

Furthermore, **Figure 23. Overpayment by Owners** shows that **of the 10 Opportunity Sites, six (Sites 1, 2, 5 through 7, and 10) are in census tracts with a concentration of 40% to 80% of renters overpaying for housing**, representing 369 lower-income and 124 moderate-income units (75.5% of the total lower-income units and 78.5% of the total moderate-income units). **The remaining Opportunity Sites (Sites 3, 4, 8, and 9), representing 120 lower-income units and 34 moderate-income units (24.5% of the total lower-income units and 21.5% of the total moderate-income units), are in a census tract with a concentration of 20% to 40% of renters overpaying for housing.**

Another way to measure the relative cost or rent burden is by comparison to the countywide average. A total of 52.7% of Coronado renters experience a rent cost burden while 56.7% of County renters do. Homeowners in the City experience cost burden at a rate of 50.8% compared to 38.8% in the County. **Table 3. Impacts on Patterns of Disproportionate Housing Needs** provides more information on the cost burden experienced by residents in Coronado.

2. Homelessness

The annual Point-in-Time (PIT) count, WeAllCount, provides an estimate of the number of homeless persons throughout San Diego County. The count includes persons living “on the street” or staying in homeless shelters. Additional descriptive information is drawn from the Homeless Management Information System (HMIS) for sheltered persons and through in-depth questionnaires conducted with approximately 20% of the unsheltered persons, to better understand the characteristics of those who are homeless in San Diego.

According to the 2023 PIT count, a total of 5,093 sheltered individuals were experiencing homelessness and a total of 5,171 unsheltered individuals were experiencing homelessness across all San Diego Region Cities. **In Coronado, there was a total count of zero sheltered individuals experiencing homelessness and one unsheltered individual experiencing homelessness.** The number of unsheltered individuals experiencing homelessness was one in 2022 and 16 in 2020, likely due to the impacts of housing from the COVID-19 pandemic.

The San Diego Regional Task Force on Homelessness (SDRTFH) is the San Diego Continuum of Care (CoC), designated by HUD to address homelessness. The Coronado Police Department attends regular meetings with the SDRTFH and the CoC to stay informed on regional issues related to homelessness. The CoC Program is designed to do the following:

- Promote communitywide commitment to the goal of ending homelessness;
- Provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness;
- Promote access to and affect utilization of mainstream programs by homeless individuals and families; and
- Optimize self-sufficiency among individuals and families experiencing homelessness.

Although the City has a low population of individuals experiencing homelessness, the Police Department has had regular and frequent contact with individuals experiencing homelessness. Shelters in San Diego routinely reach capacity on any given night, thus removing the ability for the Coronado Police Department to offer services to individuals experiencing homelessness. In 2020, Police Services solicited several homeless shelters in the City of San Diego to reserve bed space for the homelessness population. St. Vincent de Paul Village was the only organization that was able to provide a proposal for reserved bed space as other shelters were unable to offer reserved bed space.

In 2021, Coronado signed a three-year contract with St. Vincent de Paul Village to extend services for access to family rooms, inclusive of meals, and supportive services for residents of Coronado. Both rooms were added to the existing beds, providing a total of 138 beds for unhoused residents.

The Coronado Police Department reports that in 2022, the total number of clients served included 52 individuals and a total of 138 beds were provided at St. Vincent de Paul Village for individuals experiencing homelessness in Coronado. From January 2023 to July 2023, a total of 32 clients were served and a total of 108 beds were provided at St. Vincent de Paul Village for individuals experiencing homelessness in Coronado.

3. White Concentration Areas (Census Tracts)

Our analysis defines an area of concentration as an area where the percentage of a racial or ethnic concentration is over 40%. Since all the City has a higher White population than the County average, all Opportunity Sites are located in White concentrated areas.

As shown in **Figure 5. Predominant Race, nine of the 10 Opportunity Sites (Sites 1 through 9) are situated in regions with a predominance of White Alone, not Hispanic, or Latino residents**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income

units and 43.7% of the total moderate-income units), is in an area with low-medium segregation. **It is important to note that Site 10 is the anticipated Navy housing that has obtained confirmed federal funding and would not rely on public subsidies or low-income tax credits to fund the affordable units on the site.** Moreover, according to the 2021 ACS 5-Year Estimates, Coronado has a predominantly non-Hispanic/Latino White population that makes up 70.1% of the total population in the City and is substantially higher than the County average of 44.1%. **Table 3. Impacts on Patterns of Disproportionate Housing Needs**, provides more information on the racial concentrations in Coronado.

4. R/ECAP and Displacement Risk Areas

As shown in **Table 3. Impacts on Patterns of Disproportionate Housing Needs**, there are no units in Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) or in areas where there is a risk of displacement. However, **Figure 10. High Segregation and Poverty** and **Figure 24. Estimated Displacement Risk Overall** demonstrates the nearest R/ECAP and displacement risk areas are located in the City of San Diego which is connected to the City via the Coronado Bay Bridge.

5. Housing Conditions

A relatively low percentage of housing units in Coronado are considered substandard. Substandard housing issues can include structural hazards, poor construction, faulty wiring or plumbing, fire hazards, and inadequate sanitation or facilities for living. The CHAS data 2016-2020 indicate that 1% of rental units in Coronado are without a complete kitchen or adequate plumbing. In comparison, the County average of rental units without a complete kitchen or adequate plumbing is 1.6%.

The City of Coronado has historically been well-maintained and not subject to a proliferation of deferred maintenance issues. Because of the high quality of neighborhoods and the higher-than-average property values, housing units are almost universally well-maintained and exhibit no significant rehabilitation or replacement need with the exception of a handful of properties throughout the City.

The significantly low percentage of residences that could be considered to be substandard housing is also a result of Coronado's strong housing market. As a desirable community in which to live, Coronado has long had a strong housing market that supports the upkeep and maintenance of its housing stock. The City has a complaint-based code enforcement program where the City has responded to a handful of properties each year for site conditions/weed abatement. Desirability, along with upkeep provides owners with increased assessed values, which provide a financial incentive for owners of rental properties to maintain their buildings, while providing financial opportunities to homeowners needing additional funds for maintenance and upkeep.

6. Overcrowding

Less than 2% of housing units in Coronado meet the ACS definition of "overcrowding" and it is not a significant problem. The overcrowding rate of 1.2% in the City is less than in the County (7%).

Zero of the 10 Opportunity Sites are located in areas of high minority concentration or poverty, nor are they located in areas designated as susceptible to displacement because there are no census tracts in the City identified as susceptible to displacement.

Table 3. Impacts on Patterns of Disproportionate Housing Needs							
Opportunity Sites Units	Total Units	Overpayment		White Concentration ¹	Areas of Affluence	R/ECAP	Displacement
		Owner Cost Burden	Rent Burden				
Lower	489	96	96	489	92	0	0
Moderate	158	124	124	158	34	0	0
Above Moderate	182	166	166	182	16	0	0
Total	829	386	386	829	142	0	0
¹ Areas of White Concentration are areas where over 40% of the Census Tract/Block Group identified as White. There is no other concentration of race/ethnicity in Coronado.							

As stated in previous sections above, the Housing Plan contains programs to address all identified fair housing issues that are primarily focused on increasing the supply of affordable housing which reduces/prevents displacement risk and reduces the housing cost burden for residents.

7. Fair Housing Enforcement and Outreach Capacity

Fair housing enforcement and outreach capacity refers to the ability of a locality and fair housing entities to disseminate information related to fair housing laws and rights and provide outreach and education to community members. Enforcement and outreach capacity also includes the ability to address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. The Fair Employment and Housing Act and the Unruh Civil Rights Act are the primary California fair housing laws. California state law extends anti-discrimination protections in housing to several classes that are not covered by the federal Fair Housing Act (FHA) of 1968, including prohibiting discrimination on the basis of sexual orientation.

Fair Housing Compliance

Fair housing enforcement and outreach capacity refers to the ability of a locality and fair housing entities to disseminate information related to fair housing laws and rights and provide outreach and education to community members. Enforcement and outreach capacity also includes the ability to address compliance with fair housing laws, such as investigating complaints, obtaining remedies, and engaging in fair housing testing. The Fair Employment and Housing Act and the Unruh Civil Rights Act are the primary California fair housing laws. California state law extends anti-discrimination protections in housing to several classes that are not covered by the federal Fair Housing Act (FHA) of 1968, including prohibiting discrimination on the basis of sexual orientation. The City of Coronado complies with all state and federal fair housing laws, as documented in this housing element and the SDC 2020-25 AI. **The City has not received any judgements, lawsuits, consent decrees or enforcements as a result of fair housing violations.**

Fair Housing Enforcement

County-Level Enforcement

California's Department of Fair Employment and Housing (DFEH) has statutory mandates to protect the people of California from discrimination pursuant to the California Fair Employment and Housing Act (FEHA), Ralph Civil Rights Act, and Unruh Civil Rights Act (with regards to housing).

The FEHA prohibits discrimination and harassment on the basis of race, color, religion, sex (including pregnancy, childbirth, or related medical conditions), gender, gender identity, gender expression, sexual orientation, marital status, military or veteran status, national origin, ancestry, familial status, source of income, disability, and genetic

information, or because another person perceives the tenant or applicant to have one or more of these characteristics.

The Unruh Civil Rights Act (Civ. Code, § 51) prohibits business establishments in California from discriminating in the provision of services, accommodations, advantages, facilities and privileges to clients, patrons and customers because of their sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, or immigration status.

The Ralph Civil Rights Act (Civ. Code, § 51.7) guarantees the right of all persons within California to be free from any violence, or intimidation by threat of violence, committed against their persons or property because of political affiliation, or on account of sex, race, color, religion, ancestry, national origin, disability, medical condition, genetic information, marital status, sexual orientation, citizenship, primary language, immigration status, or position in a labor dispute, or because another person perceives them to have one or more of these characteristics.

Table 4. Number of DFEH Housing Complaints in San Diego County (2020)		
Year	Housing	Unruh Civil Rights Act
2015	115	16
2016	72	10
2017	82	56
2018	72	7
2019	72	7
2020	71	11
Source: DFEH Annual Reports, https://www.dfeh.ca.gov/LegalRecords/?content=reports#reportsBody		

Based on DFEH Annual Reports, **Table 4. Number of DFEH Housing Complaints in San Diego County (2020)** shows the number of housing complaints filed by San Diego County to DFEH between 2015 and 2020. A substantial decrease in number of complaints from 2015 to 2016 precedes the stagnant trend from 2018 to 2020. Note that fair housing cases alleging a violation of FEHA can also involve an alleged Unruh violation as the same unlawful activity can violate both laws. DFEH creates companion cases that are investigated separately from the housing investigation.

The Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity (HUD FHEO) enforces fair housing by investigating complaints of housing discrimination. **Table 5. Number of FHEO Filed Case by Protected Class in San Diego (2015-2020)**, shows the number of FHEO Filed Cases by Protected Class in San Diego County between 2015 and 2020. A total of 468 cases were filed within this time period, with disability being the top allegation of basis of discrimination followed by familial status, race, national origin, and sex. These findings are consistent with national trends stated in FHEO's FY 2020 State of Fair Housing Annual Report to Congress where disability was also the top allegation of basis of discrimination.

Table 5. Number of FHEO Filed Case by Protected Class in San Diego (2015-2020)						
Year	Number of Filed Cases	Disability	Race	National Origin	Sex	Familial Status
2015	103	68	15	9	6	17
2016	69	43	13	6	5	5
2017	76	58	12	3	9	7
2018	81	56	10	6	13	8
2019	103	68	9	9	8	14
2020	36	22	3	4	5	6
Source: Data.Gov - Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity (FHEO) Filed Cases, https://catalog.data.gov/dataset/fheo-filed-cases						

Furthermore, the AFFH Data Viewer reports that from the years 2013 through 2022, there were seven total inquiries by the City, of which one was familial status basis and six did not have a valid issue or basis. From 2013 to 2022, Coronado had seven valid cases which consisted of two familial status, one disability status, one race basis, and one retaliation basis cases. This low number of cases does not provide sufficient data in the City to compare to the County.

Local Enforcement (Legal Aid Society of San Diego)

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

According to data provided by LASSD and specifically for Coronado, **a total of 9.3% of all housing related calls since 2015 involved an allegation of discrimination. Of those callers alleging discrimination, 80% involved disability discrimination, 2% involved familial status discrimination, and 1% involved sex and source of income discrimination.**

The SDC 2020-25 AI found that between FY 2014 and FY 2020, **LASSD served over 19,000 client households, of which 38 households resided in the City of Coronado.** Most client households served by LASSD were lower income (87%), White (66%) and resided in the City of San Diego (53%). Based on the data reported by LASSD, fair housing issues disproportionately affected some San Diego County residents. For example, Black residents made up less than 5% of the total County population yet represented 24% of fair housing complainants.

Fair Housing Testing

Fair housing testing is a randomized audit of property owners' compliance with local, State, and federal fair housing laws. Initiated by the Department of Justice's Civil Rights Division in 1991, fair housing testing involves the use of an individual or individuals who pose as prospective renters for the purpose of determining whether a landlord is complying with local, State, and federal fair housing laws.

The 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. The SDC 2020-2025 AI also conducted Fair Housing testing to determine if, and to what extent, discriminatory business practices exist in apartment rental housing and related markets. Currently, there are no fair housing testing results for the City of Coronado.

Fair Housing Education

LASSD works to stop housing discrimination and ensure equal housing opportunities for all San Diego County residents through outreach, education, and enforcement of Federal and State Fair Housing Laws. The organization provides free support for eligible clients with fair housing issues or general questions about their rights as a tenant, and walk-in services are also offered at three office locations in San Diego County- Southeast, Midtown, and North County. In addition, LASSD has established a Fair Housing Hotline to ensure its fair housing services are readily available to the community and that a resident may promptly report any act of housing discrimination that may have occurred. LASSD also assists with the following fair housing outreach and activities:

- 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, 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 SDRAFH.

Department of Fair Employment and Housing

The mission of the DFEH is to protect Californians from employment, housing, and public accommodation discrimination, and hate violence. To achieve this mission, DFEH keeps track of and investigates complaints of housing discrimination, as well as complaints in the areas of employment, housing, public accommodations and hate violence.

Each year, DFEH generates an annual report that presents complaint trend data by county. As shown in **Table 6. DFEH Complaint Trends in San Diego County (2015-2020)**, San Diego County has steadily decreased the number of complaints filed with DFEH since 2015, which is consistent with the enforcement data reported above.

Year	Employment	Housing	Ralph Civil Rights Act	Unruh Civil Rights Act	Disabled Persons Act	Grand Total
2015	995	115	2	16	0	1,128
2016	189	72	1	10	1	273
2017	244	82	4	56	1	387
2018	244	72	7	7	3	333
2019	244	72	7	7	3	333
2020	244	71	2	11	0	328
Total ¹	2,160	484	23	107	8	2,782

¹ Does not represent the total for the entire 5th Cycle Planning Period, as 2020 is the latest data available.
Source: DFEH Annual Reports, <https://www.dfeh.ca.gov/LegalRecords/?content=reports#reportsBody>.

Summary of Fair Housing Issues

Data provided in this section of the Housing Element reflects a limited number of fair housing issues given the population and compared to the County as a whole. The primary fair housing issues in the City are a lack of housing choice related to a lack of affordable housing and access to opportunity. Ensuring access to opportunity means both improving the quality of life for residents of low-income communities, as well as supporting residents' mobility and access to 'high resource' neighborhoods. Greater access to opportunity would also provide more opportunities for

lower-income and disadvantaged persons to move to Coronado to enjoy the high level of opportunity offered. The public outreach conducted as part of the Housing Element (through a survey and two workshops with live polling, and stakeholder meetings) also confirmed these issues.

With regard to fair housing complaints, it is important to note that the numbers reflect only the number of discrimination complaints that were reported to LASSD and may not reflect the full extent of discrimination. Housing discrimination can go undetected and unreported, and it is common for victims of housing discrimination not to be able to identify, prove, or document, the discrimination that occurs. Residents may feel that they could be subject to retaliation by their housing provider if they report discrimination.

Although City residents are provided services and education by LASSD, these resources may not be sufficient to resolve all discrimination. Currently, the City of Coronado does not have a contract for services with LASSD which may limit fair housing services to meet the existing needs of residents. In order to take a proactive approach on the issue of addressing fair housing issues in both Coronado and its neighboring communities, the Housing Plan contains the a number of programs listed in Section J of this section.

E. Local Data and Knowledge

1. History

Coronado is a resort city located in San Diego County, across from the San Diego Bay from downtown San Diego, and was incorporated in 1887. In the early nineteenth century, Coronado was used as a safe harbor by whalers who also began to build hide houses to carry out their work. After Mexico gained its independence from Spain in 1821, land grants were issued for various sections of California, thus creating the grand rancheros and haciendas of this period. In 1855, part of the peninsula was leased for agriculture experiments in growing wheat and barley. Whaling companies also established whale processing. Don Pedro Carrillo gained the property of Coronado and its sister island, North Island, by a land grant signed by Mexican Governor Pio Pico on May 15, 1846.

The modern history of Coronado began in 1886 with the formation of the Coronado Beach Company, which for many years was the driving force behind the development of the peninsula as a town and resort destination. The Coronado Beach Company was organized to create a resort community, and in 1886, Elisha Spurr Babcock, along with Hampton L. Story and Jacob Gruendike, purchased the land. By 1888, Coronado was developing into a community, particularly with the founding of various organizations. The Hotel del Coronado has played a significant role in the growth and development of the City of Coronado, both in terms of its economy and its physical development. The development of the Hotel del Coronado has been intertwined with the development of the City of Coronado. Shortly after the conception of the hotel, its founders began auctioning lots on the island to attract residents to the new town of Coronado.

According to a 2022 economic impact study released by Discover Coronado, the total economic impact of tourism in Coronado sustained 950 jobs (supporting 11% of all jobs in Coronado) and generated \$8.2 million in local tax revenues in 2022. This study shows how tourism has been a significant factor in the growth and development of Coronado.

The establishment of the naval base has also had a significant impact on the growth and development of Coronado, particularly in terms of its economy, population growth, housing market, infrastructure, and environmental impact.

Here are some ways in which the naval base has impacted the growth of Coronado:

- **Economic impact:** The naval base has been a significant economic driver for Coronado. The base employs thousands of people and generates millions of dollars in economic activity for the City.
- **Population growth:** The establishment of the naval base has led to an increase in population in Coronado. Many military personnel and their families live in Coronado, which has contributed to the City's population growth over time.

- **Housing market:** The presence of the naval base has also impacted the housing market in Coronado. Military personnel and their families often look for housing in the area, which has driven up demand for housing and led to higher home prices.
- **Infrastructure:** The naval base has also impacted the infrastructure of Coronado. The base has its own facilities and infrastructure, such as housing, schools, and medical facilities.,
- **Environmental impact:** The naval base has also had an impact on the environment of Coronado. The base has implemented water conservation measures to address the ongoing drought in California. The base's environmental impact is also being studied as part of a plan to update its homeport facilities for three NIMITZ-class aircraft carriers.

Coronado's unique locale and historic development has resulted in a community that is unusual, intriguing, and inviting. Coronado's truly admirable physical environment, and the opulence, glamour, and charm of the Hotel Del Coronado, has permitted the City an isolated peaceful resort and residential community existence throughout most of its history. The compactness of the community means that commercial and civic facilities are in easy reach of pedestrians and bicyclists from most points in the City. The wealth of many of the City's early residents has permitted commercial and civic development that exceeds those of most cities of similar size. Moreover, the City's strong tourist industry and large naval facilities guarantee the continued health and variety of the City's commercial district.

2. Home Purchase Loans

The SDC 2020-2025 AI analyzed available HMDA loan data for the MSA and found that the applications for African American and Hispanic applicants were uniformly denied at higher rates than those of White or Asian Applicants. Lending discrimination is a major contributing factor to segregation in a community. When minorities are unable to obtain loans, they are far more likely to be regulated to certain areas of the community. As the Coronado rental market grows more expensive, minorities can be disproportionately impacted.

A key aspect of fair housing choice is equal access to financing for the purchase or improvement of a home. In 1977, the Community Reinvestment Act (CRA) was enacted to improve access to credit for all communities, regardless of the race/ethnic or income makeup of its residents. CRA was intended to encourage financial institutions to help meet the credit needs of communities, including low- and moderate-income people and neighborhoods. Depending on the type of institution and total assets, a lender may be examined by different supervising agencies for its CRA performance.

Additionally, the Home Mortgage Disclosure Act (HMDA) requires financial institutions with assets exceeding \$10 million to collect and submit detailed information on the disposition of home loans inclusive of applicant characteristics such as race, ethnicity, and income. HMDA data can then be evaluated to determine if there are any lending patterns indicating that loan approval rates are significantly different for one group versus another. While this evaluation can identify differences in loan application approval rates, the data and the evaluation fall short of establishing bona fide discrimination. Nonetheless, the evaluation of lending outcomes based on HMDA data is helpful in determining where to focus future study as well as present or future homebuyer education and lender training concerning the Fair Housing Act.

Federal Housing Administration (FHA) insured loans generally offer a down payment as low as 3.5% of the purchase price or home value and include the ability to finance some of the closing costs, which are generally lower than conventional loan closing costs. FHA loans are insured by the FHA, meaning that private lenders can file a claim with the FHA in the event of borrower default on an FHA insured loan. Similarly, the United States Veterans Administration (VA) offers VA guaranteed loans that are available to a current member of the U.S. armed forces, a veteran, a reservist or National Guard member, or an eligible surviving spouse through VA-approved lenders. VA mortgage loans can be guaranteed with no money down and there is no private mortgage insurance requirement. Like FHA loans, the lender is protected against loss if the borrower fails to repay the loan. FHA and VA loans provide access to credit for borrowers that may not have a sufficient down payment or credit history to qualify for

conventional loans, which generally require a minimum down payment or equity stake in the property of 5%. Since there is no government insurance on conventional loans, so these loans pose a higher risk to the financial institution and thus generally have more stringent credit, income, and asset requirements.

Table 7. Disposition of Home Purchase and Improvement Loan Applications (2022), shows the approval and denial trends for the different loan types submitted by applicants in Coronado. Of the loan types, conventional home purchase, conventional home improvement and conventional refinance loans had the highest number of loan applications for each loan type with 66% of conventional home purchase loans, 54% of conventional home improvement loans and 65% of conventional refinance loans approved. Conventional refinancing loan applications accounted for over three-quarters of all loan applications in this dataset.

Table 7. Disposition of Home Purchase and Improvement Loan Applications (2022)

	Loan Type							
	Gov't Backed Purchase		Conventional		Refinancings		Home Improvement Loans	
	#	%	#	%	#	%	#	%
Approved ¹	15	63%	160	66%	193	65%	58	54%
Denied	2	8%	20	8%	43	14%	31	29%
Other ²	7	29%	61	25%	63	21%	19	18%
Total Applicants	24	100%	241	100%	299	100%	108	100%

¹ Includes applications approved by lenders but not accepted by the applicants

² Includes files closed for incompleteness and withdrawn applications

Source: FFIEC MSA/MD 2022 Aggregate Report for Census Tracts in Coronado, CA

3. Home Improvement Loans

Reinvestment in the form of home improvement is critical to maintaining the supply of safe and adequate housing. Historically, home improvement loan applications have a higher rate of denial when compared to home purchase loans. Part of the reason is that an applicant's debt-to-income ratio may exceed underwriting guidelines when the first mortgage is considered with consumer credit balances. Another reason is that many lenders use the home improvement category to report both second mortgages and equity-based lines of credit, even if the applicant's intent is to do something other than improve the home (e.g., pay for a wedding or college). Loans that will not be used to improve the home are viewed less favorably since the owner is divesting in the property by withdrawing accumulated wealth. From a lender's point of view, the reduction in owner's equity represents a higher risk. As shown in **Table 7. Disposition of Home Purchase and Improvement Loan Applications (2022)** in 2022, 108 applications for home improvement loans were received in Coronado and approximately 54% of applications were approved. **Table 8. Disposition of Home Purchase and Improvement Loan Applications (2012)** shows the applications for home improvement loans for Coronado households in 2012. In 2012, 43 applications for home improvement loans were received and approximately 77% of applications were approved.

Table 8. Disposition of Home Purchase and Improvement Loan Applications (2012)

	Loan Type							
	Gov't Backed Purchase		Conventional		Refinancings		Home Improvement Loans	
	#	%	#	%	#	%	#	%
Approved ¹	20	67%	162	76%	855	71%	33	77%
Denied	6	20%	29	14%	188	16%	4	9%
Other ²	4	13%	23	11%	162	13%	6	14%
Total Applications	30	100%	214	100%	1205	100%	43	100%

¹ Includes applications approved by lenders but not accepted by the applicants

² Includes files closed for incompleteness and withdrawn applications

Source: FFIEC MSA/MD 2022 Aggregate Report for Census Tracts in Coronado, CA

4. Refinancing

Homebuyers will often refinance existing home loans for several reasons. Refinancing can allow homebuyers to take advantage of better interest rates, consolidate multiple debts into one loan, reduce monthly payments, alter risk (i.e., by switching from variable rate to fixed rate loans), or free up cash and capital. A substantial proportion of loan applications submitted in the City in 2022 were for refinancing existing home loans (299 applications) with a 65% approval rate. In 2012, there were 1,205 applications for refinancing with a 77% approval rate.

5. Mortgage Financing Comparison (2012 to 2022)

Overall, 24 households applied for government-backed mortgage loans, and 241 households applied for conventional home mortgage loans in Coronado in 2022 (see **Table 7. Disposition of Home Purchase and Improvement Loan Applications (2022)**). Of the applications for conventional purchase loans, 66% were approved, 8% were denied, and 25% were withdrawn or closed for incompleteness. In 2012, there were more applications for government-backed home purchase loans than in 2022. The 2022 approval rate for government-backed home purchase loans and conventional mortgage loans is also lower than the approval rates in 2012 (**Table 8. Disposition of Home Purchase and Improvement Loan Applications (2012)**). More than half (65%) of refinance applications were approved in 2022, lower than the approval rate of 71% in 2012. The denial rate in 2022 was greatest for home improvement loans (29%), while 2012 saw a lower denial rate (9%). To support mortgage assistance, the Housing Plan contains **Program H-2.D. Mortgage Credit Certificate Program**.

6. Lending Patterns by Race/Ethnicity and Income Level (2022)

Lending patterns in the MSA indicate a higher approval rating for White applicants and lower ratings for minority groups. **Table 9. Home Loan Approval Rates by Applicant Characteristics**, shows the loan approval rates for all loan applications for properties in the San Diego-Chula Vista-Carlsbad MSA in 2021 where HMDA data is available. This examination of lending activity focuses on potential discrimination in lending decisions that could prevent an individual or family from securing loan approval based on race or ethnicity. **Table 9** breaks the loan applications into income level categories first, then examines approval rates based on race or ethnicity for each loan type to determine if there are significant differences between the income category approval rate and the approval rate for each race or ethnicity group within that category.

Table 9. Home Loan Approval Rates by Applicant Characteristics

Type	Low/Mod Income < 80 Percent MFI		Low/Mod Income 80-120 Percent MFI		Low/Mod Income 120+ Percent MFI	
RACE/ETHNICITY	LOAN APPLICATIONS	APPROVAL RATE	LOAN APPLICATIONS	APPROVAL RATE	LOAN APPLICATIONS	APPROVAL RATE
White	14,351	50%	14,673	61%	37,293	66%
Asian	2,122	40%	2,893	57%	9,492	60%
Black or African American	1,004	44%	1,162	54%	1,618	58%
Hispanic or Latino	5,429	42%	5,558	55%	7,582	60%
All Others	887	40%	1,293	60%	4,274	67%
N/A or Decline to Say	6,156	42%	6,535	54%	16,254	60%

Source: San Diego-Chula Vista-Carlsbad MSA HDMA Database, 2021

7. Predatory Lending

Predatory lending involves abusive loan practices usually targeting minority homeowners or those with less-than-perfect credit histories. The predatory practices include high fees, hidden costs, unnecessary insurance, and larger repayments due in later years. A common predatory practice is directing borrowers into more expensive and higher fee loans in the “subprime” market, even though they may be eligible for a loan in the “prime” market. Predatory lending is prohibited by several state and federal laws.

8. Community Perspectives on Fair Housing Discrimination

As part of the development of the SDC 2020-25 AI, six community workshops were held in communities throughout the County to gather input regarding fair housing issues in the region. Key issues identified by participants, service providers, housing professionals and various staff include the following:

- Experience with housing discrimination by protected classes.
- Issues and barriers to reporting housing discrimination incidents.
- Barriers to access of housing in communities.
- Protected classes that need improved services
- Misconceptions and misunderstandings about fair housing.
- Importance of finding new ways to build community awareness about fair housing.

In addition, key stakeholders were interviewed regarding the County’s AI. Stakeholders represented a variety of organizations that provide fair housing services and/or complementary related support services. Key issues and opportunities identified by stakeholders include the following:

- Cultural, language and other challenges to building community awareness of fair housing issues.
- Geographic, transportation, accessibility, and other barriers to housing in communities.
- Misconceptions or misunderstandings about Fair Housing.
- Under reporting, documentation issues, opposition, and other challenges to meeting fair housing needs.
- Improved services required by protected classes.
- Opportunities with community assets which can be leveraged to further Fair Housing.
- Opportunities through improving interagency coordination.
- Technological opportunities in promoting and supporting Fair Housing outreach.

Residents throughout San Diego County were also surveyed to learn more about fair housing issues in each jurisdiction. Coronado's results indicated that respondents did experience discrimination in housing and identified the landlord/property manager as the primary source of discrimination. The survey results also found the following:

- Discrimination was primarily based upon the status and source of income.
- Discrimination is likely not reported due to lack of information/knowledge regarding where to report and how to report.
- Reasonable accommodation has been delayed multiple times according to survey respondents.
- Most survey respondents had not participated in any fair housing training and not heard or seen a Fair Housing Public Service Announcement on TV, the radio, or online.

The SDC 2020-25 AI also identified the following fair housing issues specifically involving Coronado:

- The City had a total of two fair housing cases filed from 2014-2018 and both complaints were based on disability.
- The City experienced one hate crime from 2013-2018, which was related to religion.
- Currently, the City utilizes fair housing services provided by the Legal Aid Society as contracted through the County of San Diego. The City complies with all Fair Housing regulations as set by state and federal law. The Affirmatively Furthering Fair Housing Analysis is intended to understand existing disparities in the Coronado community and provide methods and mitigation measures in **Section 4** of this Housing Element.

Please note the City will be holding a Community Workshop on October 12, 2023. The City will update this section with the results from the survey conducted during that workshop, with findings provided in a subsequent draft of this Housing Element update.

9. *Real Estate Advertising*

Rental Housing

While the process of renting an apartment or home may be less expensive and burdensome initially than the home-buying process, it may be just as time-consuming and potential renters may face discrimination during various stages of the rental process. Some of the more prevalent forms of discriminatory treatment are discussed in the sections below.

The main sources of information on rentals are newspaper advertisements, word of mouth, signs, apartment guides, the Internet, and apartment brokers. Litigation has held publishers, newspapers, and others accountable for discriminatory ads. While advertisements cannot include discriminatory references that describe current or potential residents, the neighbors or the neighborhood in racial or ethnic terms, or other terms suggesting preferences (e.g., adults preferred, ideal for married couples with kids, or conveniently located near a Catholic church), the content of the advertisement can suggest a preferred tenant by suggesting preferred residents, using models, publishing in certain languages, or restricting media or locations for advertising.

Ownership Housing

The first step in buying a home is generally searching for available housing through advertisements that appear in magazines, newspapers, or on the Internet. Advertising is a sensitive issue in the real estate and rental housing market because advertisements can advertently or inadvertently signal preferences for certain buyers or tenants. Recent litigation has held publishers, newspapers, the Multiple Listing Service (MLS), real estate agents, and brokers accountable for discriminatory ads.

Advertising can suggest a preferred buyer or tenant in several ways. Examples include advertisements or listings that:

- Suggest a preferred type of buyer or tenant household;

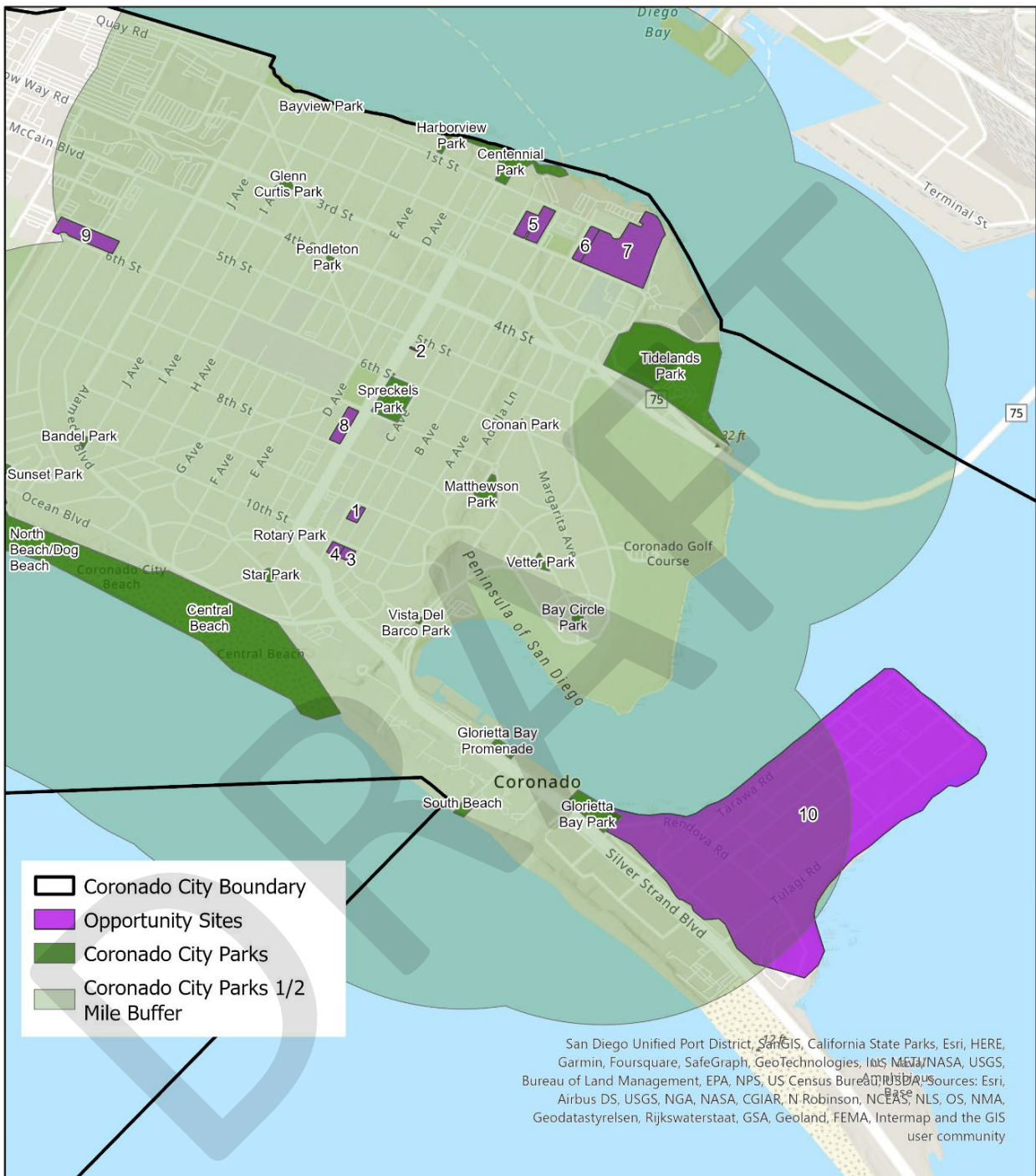
- Use models that indicate a preference or exclusion of a type of resident;
- Publish advertisements or listings in certain languages; or
- Restrict publication to certain types of media or locations indicating a preference.

Generally, advertisements cannot include discriminatory references that describe current or potential residents, the neighbors, or the neighborhood in racial or ethnic terms, or terms suggesting preferences for one group over another (e.g., adults preferred, ideal for married couples with kids, or conveniently located near Catholic church). T

10. Accessibility of Public Facilities

As shown in **Figure-25. City Parks with ½ mile Buffer**, all Opportunity Sites (Sites 1 through 10) are located within a ½ mile to a city park, representing 489 lower-income and 158 moderate-income units (100% of the total lower-income units and 100% of the total moderate-income units). Access to parks is crucial for enhancing the quality of life in a community, as it provides numerous physical, mental, social, and environmental benefits. In addition, **Figure-26. Supermarkets-Grocers with ½ mile buffer**, shows that nearly all Opportunity Sites are located within a ½ mile distance to a supermarket or grocery store. Access to a grocery store is of paramount importance for fostering access to opportunity, promoting community health, and enhancing overall quality of life.

Figure-25. City Parks with ½ mile Buffer



Source: City of Coronado, HCD AFFH 2.0 Data Viewer



Harris & Associates

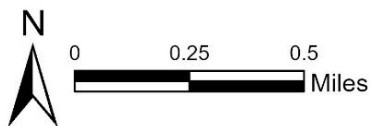
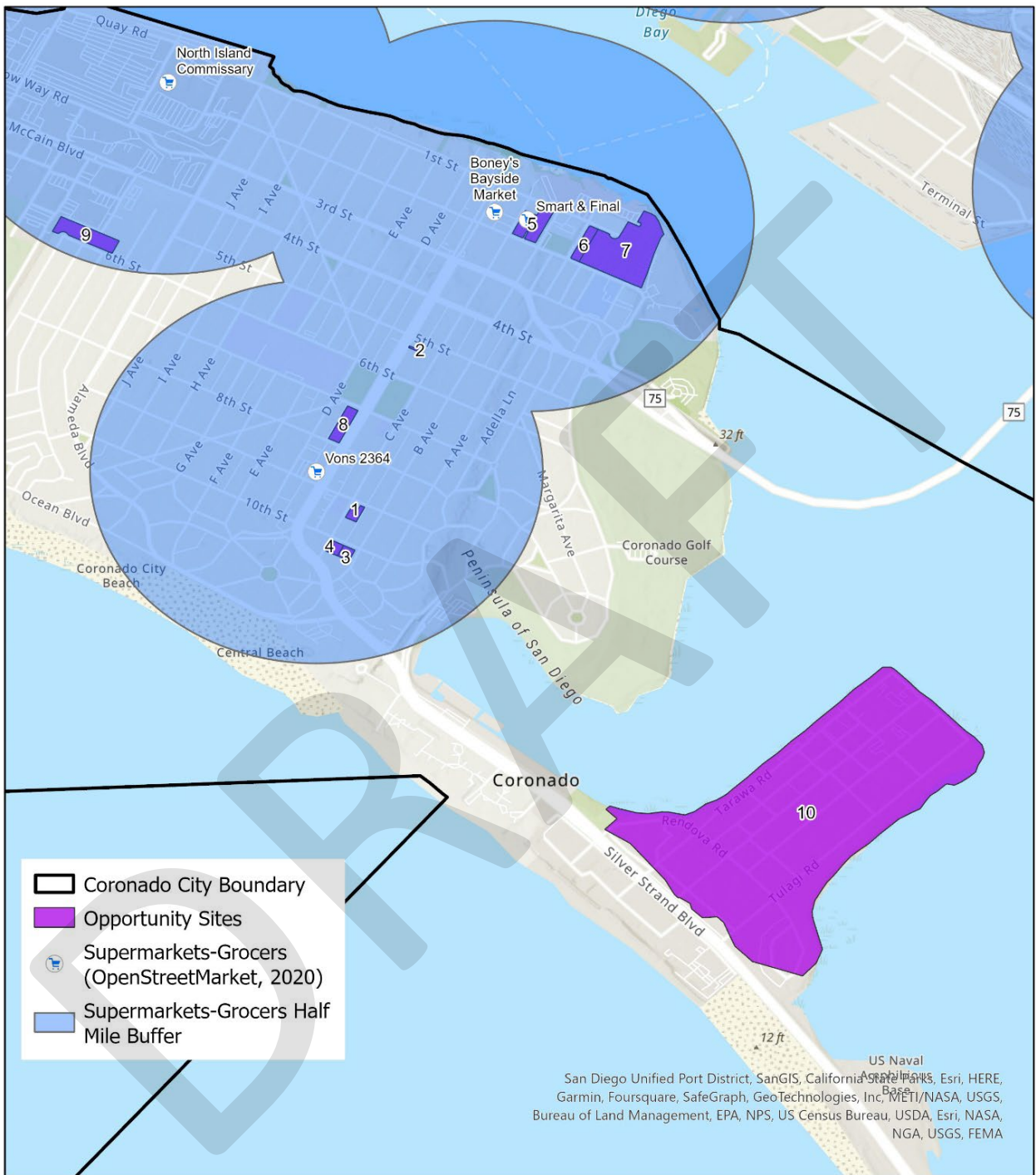


0 0.25 0.5
Miles

City Parks with Half Mile Buffer

City of Coronado Affirmatively Furthering Fair Housing

Figure-26. Supermarkets-Grocers with ½ mile buffer



Supermarkets-Grocers with Half Mile Buffer

City of Coronado Affirmatively Furthering Fair Housing

11. Other Relevant Factors

Other contributions that affect the accumulation of wealth and access to resources include historical disinvestment, lack of infrastructure improvements, and presence of older affordable housing units that may be at risk of conversion to market-rate housing. As documented in this Housing Element, Coronado is a generally a high resource area and has historically made significant investments in infrastructure. Additionally, the Housing Plan includes **Program H-2.A: Pursue State and Federal Funding for Affordable Housing**.

F. Historical Governmental and Nongovernmental Land Use

1. Zoning and Investment Practices (e.g., Infrastructure)

The City of Coronado is bounded by the Pacific Ocean on the West, Naval Air Station North Island on the Northwest, San Diego Bay on the Northeast and East, and the City of Imperial Beach on the South. The area of the City from Imperial Beach to just North of the Naval Amphibious Base is often termed the "Silver Strand". The entire City is within the Coastal zone as defined by the Coastal Act of 1976 and the State Coastal Commission.

The City's physical environment and history are most responsible for Coronado's existing development patterns. The physical location of the community has dictated its geographic boundaries, affected its development, and helped to determine its character. The City's proximity to the ocean and its island-like characteristics have resulted in high land and housing values. The community is nearly built out, with virtually no developable vacant land. With its bases and recreational resources, it has both a large military population and a substantial transient daytime tourist population. The community experiences extensive cross-commuting, with many of its residents working elsewhere in the region and numerous commuters crossing the City to work on its bases and in its tourist facilities.

The development of Coronado dates to 1886, when Elisha S. Babcock and H. L. Story, the joint owners of the whole Coronado peninsula, formed the Coronado Beach Company, subdivided a portion of their holdings, cleared the land, graded streets, and held Coronado's first land auctions. The next year, Babcock and Story built the Hotel Del Coronado with the money accumulated from the land sales and opened its doors in 1888. The Hotel del Coronado has played a significant role in the growth and development of the City of Coronado.

Coronado is located at the northern end of the Silver Strand, a long narrow strip of land that connects Coronado to the rest of San Diego County. Historically, access to Coronado was either by ferry from San Diego or by driving up from the south. In 1969 the San Diego-Coronado Bay Bridge was opened, which offered convenient access between the two cities. The Bridge spans approximately 2.3 miles across the San Diego Bay and provides one of the only two automobile access routes to the City. The other route is through State Route 75 (SR-75), also known as Silver Strand, accessed from the City of Imperial Beach.

Coronado is one of the region's most famous resort communities with the historic Hotel Del Coronado, two other world-class hotels, and a world-renowned public beach. Military and tourism are the City's two major industries. The U.S. Navy, with three bases in the City, has a strong presence in Coronado. Naval Air Station, North Island was commissioned as a Naval Air Station in 1917 and is the largest aviation industrial complex on the West Coast. The Naval Amphibious Base Coronado, situated on the Silver Strand, is the West Coast center of special and expeditionary warfare training and operations. The Silver Strand Training Complex in Coronado, also on the Silver Strand, borders the City of Imperial Beach to the south.

2. The Great Recession and Redevelopment Dissolution

As with other cities across the country, housing development slowed significantly starting in 2008-09 with the Great Recession. Housing types developed in the City also shifted as more multifamily units were built to adapt to the housing market changes caused by the Recession.

In accordance with State law, the City's redevelopment agency, the Community Development Agency (CDA) of the City of Coronado, dissolved on February 1, 2012. Prior to dissolution, the City Council elected to become the

Successor Agency and to retain the housing assets and functions previously performed by the CDA. Redevelopment projects that were in progress were completed. The 20% housing set aside funds generated by redevelopment activity constituted the primary source of funding for affordable housing in Coronado. There has been no alternative local funding source and State funding sources are limited to grants and low-income housing tax credits, both of which are highly competitive. Dissolution of the CDA is and will continue to be a significant constraint to the City's ability to subsidize future affordable housing projects.

G. Sites Inventory

1. Disproportionate Housing Need

As provided earlier in this section, **Table 3. Impacts on Patterns of Disproportionate Housing Needs**, provides an Opportunity Sites summary of the number of units by income group for each of the AFFH categories relative to the impacts on patterns of disproportionate housing needs. The table analyzes the following categories:

Overpayment/Cost Burden

According to the federal government, overpayment is considered any housing condition where a household spends more than 30% of income on housing. A cost burden of 30% to 50% is considered moderate overpayment; payment in excess of 50% is considered severe overpayment. Overpaying is an important housing issue because paying too much for housing leaves less money available for emergency expenditures.

The analysis evaluates the number of units in the Opportunity Sites that are in areas where the majority (more than 50%) of households experience housing cost burden. Cost burden is defined as having over 30% of a household's income go towards rent and utilities each month. As shown in **Figure 22. Overpayment by Renters, of the 10 Opportunity Sites, nine (Sites 1 through 7 and 9 through 10) are in census tracts with a concentration of 40% to 80% of renters overpaying for housing**, representing 442 lower-income and 158 moderate-income units (90.0% of the total lower-income units and 100.0% of the total moderate-income units). **The remaining Opportunity Site (Site 8)**, representing 47 lower-income units and zero moderate-income units (10.0% of the total lower-income units and 0.0% of the total moderate-income units), **is in a census tract with a concentration of 20% to 40% of renters overpaying for housing.**

Furthermore, **Figure 23. Overpayment by Owners** shows that **of the 10 Opportunity Sites, six (Sites 1, 2, 5 through 7, and 10) are in census tracts with a concentration of 40% to 80% of renters overpaying for housing**, representing 369 lower-income and 124 moderate-income units (75.5% of the total lower-income units and 78.5% of the total moderate-income units). **The remaining Opportunity Sites (Sites 3, 4, 8, and 9)**, representing 120 lower-income units and 34 moderate-income units (24.5% of the total lower-income units and 21.5% of the total moderate-income units), **are in a census tract with a concentration of 20% to 40% of renters overpaying for housing.**

Another way to measure the relative cost or rent burden is by comparison to the countywide average. A total of 52.7% of Coronado renters experience a rent cost burden while 56.7% of County renters do. Homeowners in the City experience cost burden at a rate of 50.8% compared to 38.8% in the County. **Table 3. Impacts on Patterns of Disproportionate Housing Needs** provides more information on the cost burden experienced by residents in Coronado.

White Concentration Areas (Census Tracts)

HUD defines an area of concentration as an area where the percentage of a racial or ethnic concentration is over 40%. Since all the City has a higher White population than the County average, all Opportunity Sites are located in white-concentrated areas.

As shown in **Figure 5. Predominant Race**, **nine of the 10 Opportunity Sites (Sites 1 through 9) are situated in regions with a predominance of White Alone, not Hispanic, or Latino residents**, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income

units and 43.7% of the total moderate-income units), is in an area with low-medium segregation. **It is important to note that Site 10 is the anticipated Navy housing that has already obtained federal funding and would not rely on public subsidies or low-income tax credits to fund the affordable units on the site.** Moreover, according to the 2021 ACS 5-Year Estimates, Coronado has a predominantly non-Hispanic/Latino White population that makes up 70.1% of the total population in the City and is substantially higher than the County average of 44.1%. **Table 3. Impacts on Patterns of Disproportionate Housing Needs**, provides more information on the racial concentrations in Coronado.

Areas of Affluence

As shown in **Table 3. Impacts on Patterns of Disproportionate Housing Needs**, 17% of all units are in areas of affluence. This is due primarily to the fact that affluent areas are mostly built out, with few sites for potential new development.

As shown in **Figure 11, four of the 10 Opportunity Sites (Sites 1, 3, 4, and 9)**, representing 92 lower income and 34 moderate-income units (18.8% of the total lower-income units and 21.5% of the total moderate-income units) **are located within an RCAA**. The third RCAA is in Census Tract 106.01 with a median income of \$130,457 and a 74.5% White population (2021 ACS 5-Year Estimates). As shown in **Figure 1. Coronado Census Tracts and Surrounding Cities**, Census Tract 106.01 is directly adjacent to the City of Imperial Beach. It is important to note that **Census Tract 106.01 is not shown in Figure 11, as there are no opportunity sites located in this neighborhood**. For the San Diego Association of Governments (SANDAG) as a whole, the average percentage of total White population was 46.9%, and the average median household income for the County was \$83,753. This data indicates that White households in Coronado are more affluent (based on median income) as compared to White households in San Diego County.

R/ECAP and Displacement Risk Areas

As shown in **Table 3. Impacts on Patterns of Disproportionate Housing Needs**, there are no units in Racially/Ethnically Concentrated Areas of Poverty (R/ECAP) or in areas where there is a risk of displacement. However, **Figure 10. High Segregation and Poverty** and **Figure 24. Estimated Displacement Risk Overall** demonstrates the nearest R/ECAP and displacement risk areas are located in the City of San Diego which is connected to the City via the Coronado Bay Bridge.

Overcrowding

Less than 2% of housing units in Coronado meet the ACS definition of “overcrowding” and it is not a significant problem. The overcrowding rate of 1.2% in the City is less than in the County (7%).

The City has worked to distribute the units in the Opportunity Sites in a way that will not concentrate affordable housing in areas of high minority concentration or poverty. **Zero of the 10 Opportunity Sites are located in areas of high minority concentration or poverty, nor are they located in areas designated as susceptible to displacement because there are no census tracts in the City identified as susceptible to displacement.**

As stated in previous sections above, the Housing Plan contains programs to address all identified fair housing issues that are primarily focused on increasing the supply of affordable housing which reduces/prevents displacement risk and reduces the housing cost burden for residents.

Integration and Segregation: Race and Income

Concentrated area of poverty is defined by the HUD as a census tract where the percentage of individuals living in households with incomes below the poverty rate is more than the lesser of 40% or three times the average poverty rate for the metropolitan area. The City is within the San Diego metropolitan area, where the average household poverty rate (according to 2021 ACS 5-Year Estimates) is approximately 10.7%. **As depicted in Figure 10. High Segregation and Poverty, there are no census tract block groups within Coronado designated as "High Segregation & Poverty" according to the TCAC/HCD maps.**

Minority Concentration here is defined as a Block Group or Census Tract that has a minority population higher than the County average. The City has no areas with a minority concentration.

The lower-income sites in the Opportunity Sites are less likely to be in minority and poverty concentration areas, as detailed in the following:

- 0.0% of lower-income units are in (overall) minority concentration areas compared to 0.0% of moderate- and above moderate-income units.
- 59% of lower-income units are in White concentration areas compared to 41% of moderate and above moderate-income units.
- There are no areas of poverty concentration in Coronado as defined above.
- 11% of lower-income units are in census tracts that are areas of affluence compared to 6% of moderate and above moderate-income units.

It is important to note that sites, including lower-income sites, were identified pursuant to state law requirements and the HCD Site Inventory Guidebook, which dictate that non vacant properties designated with lower-income units (there is little to no vacant land appropriate for residential development in the City) must demonstrate redevelopment potential in order to be included in the site inventory. The evidence provided in **Section 7. Adequate Sites Inventory Analysis and Methodology**, of this Housing Element shows that the highest redevelopment potential exists for properties within the village area, and also in close proximity to the Coronado Bay Bridge which connects these areas to southern San Diego.

This area of the City is also close to high frequency transit, goods and services, jobs and schools and residential development in Downtown aligns with developing housing near transit and jobs as detailed in the 2025 California Statewide Housing Needs Assessment. Additionally, the location of the lower-income sites provides for higher scoring on Low-income Housing Tax Credits, the largest single funding source for affordable housing that exists today.

Access to Opportunity

Of the eight census tracts in Coronado, six are designated as Highest or High Resource, and one is designated as Moderate Resource. The remaining census tract does not have enough data to be designated, as it encompasses Naval Air Station North Island. There are no Low Resource areas or Disadvantaged Communities (per the TCAC/HCD Opportunity Map) within Coronado. Within San Diego County, most of the High and Highest Resource areas are located in the northern and coastal parts of the County.

Table 2. Opportunity Area Map Scores and Categorization shows the scores by domain for each census tract. In addition, **Figure 2. TCAC Opportunity Map Composite Score** illustrates the categorization of resource areas in and around the City.

Nine of the 10 Opportunity Sites (Sites 1 through 9) are located within High or Highest Resource areas, representing 184 lower-income and 89 moderate-income units (37.6% of the total lower-income units and 56.3% of the total moderate-income units). **The remaining Site 10**, representing 305 lower-income and 69 moderate-income units (62.4% of the total lower-income units and 43.7% of the total moderate-income units) **is in a Moderate Resource area. It is important to note that Site 10 is the anticipated Navy housing that has already obtained federal funding and would not rely on public subsidies or low-income tax credits to fund the affordable units on the site.**

Concentration of Lower-Income Sites Near Transit

The majority of Opportunity Sites are located in close proximity to transit services as shown in **Figure 8. Bus Stops with ½ Mile Buffer**. As mentioned earlier in this Section, HCD's Intersectional Policy Work webpage asserts the following regarding housing and transportation:

“After housing, transportation is the second-largest household expense... People who live near transit and job centers drive less, particularly lower income residents. More recently, however, those areas have become less and less affordable. Housing near transit is in high demand, and rents and property values near transit are 10 to 20% higher on average than similar homes further from transit. Modeling and analysis by the Legislative Analyst’s Office suggest ‘California’s high housing costs cause workers to live further from where they work, likely because reasonably priced housing options are unavailable in locations nearer to where they work.’ When households move further from job- and transit-rich areas to find more affordable homes, they encounter higher transportation costs and longer commutes. Beyond the quality-of-life consequences for individual households, longer commutes also increase greenhouse gas emissions and decrease productivity.”

As stated by HCD, lower-income households are especially vulnerable to displacement and higher housing cost burden. The increase in housing demand across the region, especially near transportation can force families to move further away from job centers and “over-commute,” leading to increased transportation costs..

Although there are no areas in Coronado with high levels of pollution, as shown in **Figure 16. CalEnviroScreen 4.0 Percentile Score**, the City has taken several actions that are aligned with these recommendations, including:

- Prioritizing the City’s available sites closest to transportation and job centers for lower-income families is an important goal of this Housing Element. However, the City also considers housing mobility to be an important element of helping the community thrive. The City has supported housing mobility and opportunity through the following actions:
- **Local Density Bonus Program:** The City updated its Density Bonus program to require an allowance of up to 50 percent density bonus when the base BMR is proposed, as required by AB 2345. The City of Coronado has included **Program H-2.K: Amend Density Bonus Ordinance** to update the City’s Municipal Code in compliance with state legislation.
- **Inclusionary Housing Requirement:** The City of Coronado has an Inclusionary Housing Program. Residential developers of projects with two or more units must incorporate affordable housing into their projects or pay an in-lieu fee. The development must set aside 20% of the units in each project as affordable or pay an in-lieu fee of \$7,000 per market-rate dwelling unit. Revenues from this in-lieu fee, plus interest earned on these funds, are placed into an Affordable Housing Special Revenue Fund.

While the City has taken important steps to increase housing opportunity and availability throughout the City, the data and analysis presented in this section of the Housing Element indicate that the primary fair housing issue in Coronado is a lack of housing choice and mobility caused by a lack of affordable housing. In addition to accommodating the RHNA, the City will implement a suite of actions to improve housing mobility and offer new choices and affordability. These actions are intended to address the City’s RCAA’s and well as increase diversity. Actions could include but are not limited to the objectives from the following programs of **Section 8: Housing Plan**:

- **Program H-2.L:** Housing Choices
- **Program H-3.I:** Housing Mobility

Furthermore, the general lack of affordable housing in the City contributes to the lack of housing choice and mobility. To address this ongoing issue, the Housing Plan contains 29 programs specifically targeted to encourage and facilitate the development of affordable housing units in the City. This effort will increase the number of affordable housing units and support access to resources such as housing choice vouchers, thereby alleviating the lack of housing choice and fostering greater housing mobility. These programs include but are not limited to the following:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing

- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.F:** Funding to Support Fair Housing
- **Program H-3.G:** Analysis of Impediments to Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations
- **Program H-3.I:** Housing Mobility
- **Program H-3.J:** Multi-Modal Mobility Enhancement
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.D:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Process
- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

2. Lower Income Sites

The location of housing in relation to resources and opportunities is integral to addressing disparities in housing needs and opportunity and to fostering inclusive communities where all residents have access to opportunity. This is particularly important for lower-income households. AB 686 added a new requirement for Housing Elements to analyze the location of lower-income sites in relation to areas of high opportunity.

The TCAC and HCD have prepared opportunity maps that identify resource areas. Areas of high or highest resource have increased access to public services, educational and employment opportunities, medical services, and other daily services (e.g., grocery, pharmacy). Nearly all of Coronado is a high resource area or moderate resource area.

The City's Opportunity Sites were also chosen and qualified based on the legal criteria in the California Government Code and based on the HCD Site Inventory Guidebook instructions on selecting appropriate sites. Additionally, affordability assumptions are made to balance locating lower-income sites in areas that are already zoned for higher-density residential development, in high resource areas, and in close proximity to jobs, goods and resources. All of the City's Opportunity Sites include lower income units and given that nearly all of Coronado is a high resource or moderate resource area, this allows potential affordable housing projects seeking low-income housing tax credits to be competitive, increasing the feasibility of funding and completed projects.

3. Moderate and Above Moderate-Income Units

All of the total moderate and above moderate-income units in the Opportunity Sites are located in moderate to highest resource areas. **Table 10. TCAC/HCD Opportunity Area Map Summary**, provides a summary of units from the Opportunity Sites in relation to their location on the TCAC/HCD Opportunity Area Map.

Table 10. TCAC/HCD Opportunity Area Map Summary

TCAC Resources	Very Low (#)	Low (#)	Moderate (#)	Above Moderate (#)	Very Low (%)	Low (%)	Moderate (%)	Above Moderate (%)
Highest Resource	73	0	34	16	31%	0%	22%	9%
High Resource	111	0	55	166	47%	0%	35%	91%
Moderate Resource ¹	51	254	69	0	22%	100%	44%	0%
Low Resource	0	0	0	0	0%	0%	0%	0%
High Segregation & Poverty	0	0	0	0	0%	0%	0%	0%
Missing/Insufficient Data	0	0	0	0	0%	0%	0%	0%

¹Site 10 (Navy Site) is the only opportunity site located in a Moderate Resource area.

Source: California Tax Credit Allocation Committee, 2023

4. Equitable Site Placement

The City used a multi-layered approach in selecting sites, including reviewing access to local and regional resources, socio-economic indicators, and housing market opportunities. Housing sites were identified in relation to resources and opportunities, as this is integral to fostering inclusive communities and addressing disparities in housing. Higher resourced areas have increased access to public services, educational and employment opportunities, medical services, and other daily services (e.g., grocery, pharmacy).

As shown in **Table 11. Socio-Economic Indicators By Census Tract**, Census Tracts 108 and 109 are in high resource areas and include only very low-income units. Census Tract 218 is in the highest resource area and includes very low-income units, as well as moderate and above moderate. Census Tract 216 is in a moderate resource area and includes very low-, low-, and moderate-income units. By examining the data provided, it becomes evident that these census tracts were selected with the intention of mitigating fair housing issues and ensuring equal access to affordable housing opportunities for all residents.

In addition to the Opportunity Sites, the City has added several AFFH programs intended to expand locations of housing opportunities throughout the City, and specifically the highest resourced areas. These AFFH programs aim to provide an additional 892 units of housing in these areas. These 892 units will help fulfill the City's 6th Cycle RHNA requirements. These programs also have the added benefit of furthering opportunities for housing equity and mobility across the City.

Table 11. Socio-Economic Indicators By Census Tract

Census Tract	Net Units of Capacity									TCAC Opp. Category	% Non-White	% LMI Pop.	R/ECAP	% Over-crowded	Renter Cost Burden	Owner Cost Budren
	Very Low	%	Low	%	Moderate	%	Above Moderate	%	Total							
6073010800	47	20.0%	--	--	--	--	--	--	47	High Resource	26.4%	52%	No	0.76%	37.4%	37.8%
6073010900	19	8.1%	--	--	--	--	--	--	19	High Resource	17.2%	39%	No	3.98%	45.6%	42.6%
6073011000	45	19.1%	--	--	55	34.8%	166	91.2%	266	High Resource	20.3%	69%	No	0.92%	57.0%	59.5%
6073021600	51	21.7%	254	100%	69	43.7%	--	--	374	Moderate Resource	44.7%	53%	No	1.23%	74.1%	74.6%
6073021800	73	31.1%	0	--	34	21.5%	16	8.8%	123	Highest Resource	17.5%	49%	No	0%	47.3%	38.8%
Total	235		254		158		182		892							

Source: AFFH 2.0 Data Viewer

Note: Percent of Low to Moderate Income Population (HUD, 2011-2015) was calculated by census block group.

H. Analysis of Fair Housing Priorities and Goals

To enhance mobility and promote inclusion for protected classes, the chief strategy included in this housing element is to provide sites suitable for affordable housing in high-resource, high opportunity areas, as demonstrated by the analysis of the housing resource sites contained in **Section 3: Housing Resources**. Other programs that affirmatively further fair housing include:

- **Program H-1.A:** Accessory Dwelling Units (ADUs)
- **Program H-1.B:** Technical Assistance to Developers
- **Program H-1.F:** General Plan Update Program
- **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
- **Program H-2.B:** Local Funding for Affordable Housing
- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
- **Program H-2.E:** Housing Choice Voucher Program
- **Program H-2.G:** Regional Collaboration on Affordable Housing
- **Program H-2.H:** Assist with the Development of Affordable Housing
- **Program H-2.I:** Advertise Available Resources
- **Program H-2.J:** Faith Based Properties
- **Program H-2.L:** Housing Choices
- **Program H-3.A:** Assistance to Extremely Low-income Households
- **Program H-3.B:** Housing Opportunities for Persons with Special Needs
- **Program H-3.C:** Senior Housing and Assisted Living Units
- **Program H-3.D:** Accessible Housing Design
- **Program H-3.E:** Affirmatively Further Fair Housing
- **Program H-3.H:** Collaboration with Community Based Organizations
- **Program H-3.I:** Housing Mobility
- **Program H-4.A:** Carriage House Program
- **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
- **Program H-4.F:** AB 1486 City-Owned Land
- **Program H-5.A:** Streamline Process
- **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
- **Program H-5.D:** Compliance with AB 139 Requirements - Emergency Shelters

I. Assessment of Contributing Factors to Fair Housing Issues in Coronado

It is important to note that the Affirmatively Furthering Fair Housing section of this Housing Element was prepared with analysis of Opportunity Sites only and does not include the Pipeline Sites, as specified in **Section 7. Adequate Sites Inventory Analysis and Methodology**. There are 100 Pipeline Sites (Sites 11 through 110) that have planned or approved units, or units in the process of being constructed. All units on Pipeline Sites are above moderate units. Therefore, an analysis of these residential units that are certain to be constructed during the 6th Cycle are not included in this section.

The SDC 2020-25 AI does not identify specific impediments to fair housing specific to Coronado, however some of the regional impediments to fair housing identified within jurisdictions in San Diego County may assist Coronado in opening the community up to a broader range of future residents:

- Fair housing information needs to be disseminated through many media forms to reach the targeted groups.
- Hispanics, Blacks, and Asians continue to be under-represented in the homebuyer market and experience large disparities in loan approval rates.

- Housing choices for special needs groups, especially persons with disabilities and seniors, are limited.
- Fair housing enforcement activities, such as random testing, are limited.
- Patterns of racial and ethnic concentration exist in the region, although there are no racially or ethnically concentrated areas of poverty in Coronado.

The analysis conducted in this section regarding fair housing issues within Coronado yielded the following conclusions:

- **Lack of Affordable Housing:** As shown in the data presented in this section of the Housing Element, Coronado homeowners are significantly cost-burdened (50.8%) compared to the County (38.8%). In addition, 57.2% of Coronado renters spend more than 30% of their income on housing costs, compared to 56.7% of the County average. The Housing Plan of this Housing Element includes 32 programs to encourage, facilitate and expand affordable housing in the City at all income levels. These programs include:
 - **Program H-1.A:** Accessory Dwelling Units (ADUs)
 - **Program H-1.B:** Technical Assistance to Developers
 - **Program H-1.F:** General Plan Update Program
 - **Program H-2.A:** Pursue State and Federal Funding for Affordable Housing
 - **Program H-2.B:** Local Funding for Affordable Housing
 - **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
 - **Program H-2.E:** Housing Choice Voucher Program
 - **Program H-2.G:** Regional Collaboration on Affordable Housing
 - **Program H-2.H:** Assist with the Development of Affordable Housing
 - **Program H-2.I:** Advertise Available Resources
 - **Program H-2.J:** Faith Based Properties
 - **Program H-2.K:** Amend Density Bonus Ordinance
 - **Program H-2.L:** Housing Choices
 - **Program H-3.A:** Assistance to Extremely Low-Income Households
 - **Program H-3.B:** Housing Opportunities for Persons with Special Needs
 - **Program H-3.C:** Senior Housing and Assisted Living Units
 - **Program H-3.E:** Affirmatively Further Fair Housing
 - **Program H-3.F:** Funding to Support Fair Housing
 - **Program H-3.G:** Analysis of Impediments to Fair Housing
 - **Program H-3.H:** Collaboration with Community-Based Organizations
 - **Program H-3.I:** Housing Mobility
 - **Program H-4.A:** Carriage House Program
 - **Program H-4.B:** Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources
 - **Program H-4.D:** AB 1486 City-Owned Land
 - **Program H-5.A:** Streamline Processes
 - **Program H-5.B:** Supportive Housing and Low Barrier Navigation Centers
 - **Program H-5.C:** Availability of Housing-Related Policies and Regulations
 - **Program H-5.D:** Compliance with AB 139 Requirements – Emergency Shelters
 - **Program H-5.E:** Update Farmworker and Employee Housing Zoning
 - **Program H-5.F:** Update the Accessory Dwelling Unit Ordinance
 - **Program H-5.H:** Nongovernmental Constraints
- **Moderate Segregation:** According to the AFFH 2.0 Data Viewer, Coronado consists of high White segregation census tracts in the central areas of the City, and Low-Medium Segregation census tracts to the north and south of the City. Overall, Coronado has a predominant population of White alone, not Latino or Hispanic, at a rate of 70.1% (2021 ACS 5-Year Estimates). Additionally, the City has three census tracts

classified as Racially Concentrated Areas of Affluence of which these areas include a White alone, not Hispanic, or Latino population over 70% and a median income above the County's Area Median Income. This underscores the need for programs to increase housing opportunities for people of color and people with lower to moderate incomes. As a part of Coronado's efforts to further opportunities for fair housing for people of color, the City included the following goals and programs in **Section 8: Housing Plan**:

- **Program H-2.C:** Facilitate Equitable Access to Affordable Housing for Underrepresented Residents
 - **Program H-2.G:** Regional Collaboration on Affordable Housing
 - **Program H-3.B:** Housing Opportunities for Persons with Special Needs
 - **Program H-3.E:** Affirmatively Further Fair Housing
- **Lack of Community Support for Affordable Housing.** Community concerns about increased density and additional housing development is a contributing factor to fair housing and housing access in the City of Coronado. Information sharing with Coronado residents would increase awareness about what income levels qualify for "affordable housing" and comparing those to average incomes of seniors with social security as the main form of income, veterans, teachers, public safety, and other employees. The City has received comments objecting to the proposed increase of housing opportunities in the City, with specific objections to increases in density and affordable housing. As a part of Coronado's efforts to encourage community support for affordable housing, the City included the following goals and programs in **Section 8: Housing Plan**:
 - **Program H-3.A:** Assistance to Extremely Low-Income Households
- **Housing Mobility.** The increasing unaffordability of housing forces families to reside farther from jobs incurring higher transportation costs and sometimes experiencing displacement as a result. Coronado recognizes the importance of enabling residents to access housing, acknowledging the existing challenges of limited affordable housing options and the difficulty and expense of assembling sites large enough for an affordable housing project. Coronado seeks to provide greater housing mobility, enhancing residents' ability to choose their desired neighborhoods by providing diverse housing choices, supporting affordable housing, and encourage housing for various income levels, including seniors and/or veterans on fixed incomes that are increasingly priced out of the local rental market, early to mid-career teachers and public employees (including first responders and military personnel) and those employed by the vibrant tourism industry on the island. This approach not only fosters housing diversity but also improves the quality of life for all community members. As a part of Coronado's efforts to further housing mobility efforts, the City included the following goals and programs in Section 8: Housing Plan:
 - **Program H-2.L:** Housing Choices
 - **Program H-3.I:** Housing Mobility
 - **Program H-3.J:** Multi-Modal Mobility Enhancement
- **Fair Housing Enforcement and Outreach Capacity:** Currently, the Legal Aid Society of San Diego (LASSD) provides fair housing services to the City of Coronado. This includes providing fair housing outreach, education, investigation, and counseling services. Although City residents are provided services and education by LASSD these resources may not be sufficient to resolve all discrimination. The City of Coronado does not have a contract for services with LASSD which may limit fair housing services to meet the existing needs of residents. The SDC 2020-25 AI found that between FY 2014 and FY 2020, LASSD served over 19,000 client households, of which 38 households resided in the City of Coronado. Most client households served by LASSD were lower income (87%), White (66%) and resided in the City of San Diego (53%). Based on the data reported by LASSD, fair housing issues disproportionately affected some San Diego County residents.

For example, Black residents made up less than 5% of the total County population yet represented 24% of fair housing complaints. Because the City does not contract directly with LASSD for fair housing, some issues experienced by residents may go unreported. To ensure that residents have better access to resources, the City will enter into a contract with LASSD, as evidenced in **Program H-3.E: Affirmatively Further Fair Housing**.

- **Lack of Regional and Local Cooperation:** According to the SDC 2020-25 AI, the areas with the lowest scores of access to opportunity generally match the geographic distribution of minorities, low- and moderate-income persons, and poverty concentrations throughout the County. Some of these areas are connected to Coronado via the Coronado Bay Bridge. Among other contributing factors, lack of regional and local cooperation plays a role in the lack of access to opportunity. To mitigate this, the City will implement **Program H-2.G: Regional Collaboration on Affordable Housing** to explore partnerships and opportunities to increase housing opportunities through regional and local collaboration.

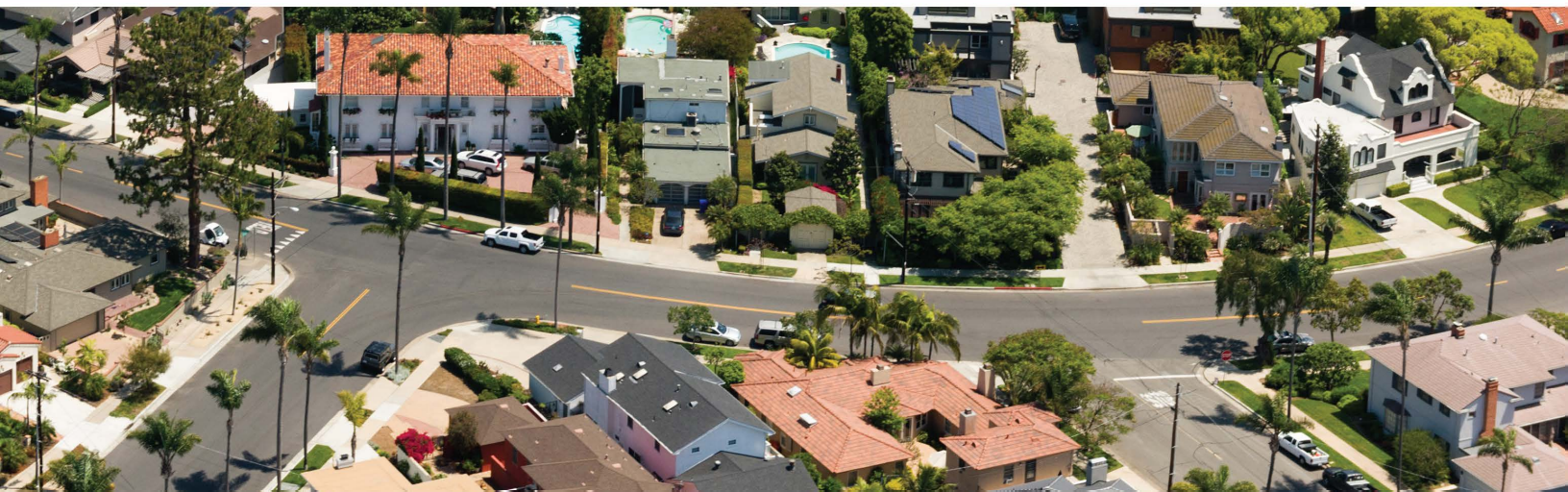
Contributing Factor	Programs	Timeframe/Metrics
Cost Burden Poverty Status	Program H-1.A: Accessory Dwelling Units (ADUs) Program H-1.B: Technical Assistance to Developers Program H-2.A: Pursue State and Federal Funding for Affordable Housing Program H-2.B: Local Funding for Affordable Housing Program H-2.C: Facilitate Equitable Access to Affordable Housing for Underrepresented Residents Program H-2.E: Housing Choice Voucher Program Program H-2.G: Regional Collaboration on Affordable Housing Program H-2.H: Assist with the Development of Affordable Housing Program H-2.I: Advertise Available Resources Program H-2.J: Faith Based Properties Program H-3.A: Assistance to Extremely Low-income Households Program H-3.B: Housing Opportunities for Persons with Special Needs Program H-3.C: Senior Housing and Assisted Living Units Program H-3.D: Accessible Housing Design Program H-3.E: Affirmatively Further Fair Housing Program H-4.A: Carriage House Program Program H-4.B: Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources Program H-5.D: Compliance with AB 139 Requirements - Emergency Shelters	Many programs will aim to be completed within one year from the time of Housing Element Certification. Some programs will be ongoing throughout the planning period or completed on an annual basis, while others will seek to be completed by FY 24-25. For specific timeframes and metrics, please see the programs detailed in Section 8: Housing Plan.
Permit processing	Program H-1.B: Technical Assistance to Developers	Annually after Housing Element Certification, December 31 of each year.
Non-Hispanic/Latino White Concentration Racially Concentrated Areas of Affluence	Program H-2.C: Facilitate Equitable Access to Affordable Housing for Underrepresented Residents Program H-2.G: Regional Collaboration on Affordable Housing Program H-3.B: Housing Opportunities for Persons with Special Needs Program H-3.E: Affirmatively Further Fair Housing	Many programs will aim to be completed within one year from the time of Housing Element Certification. Some programs will be ongoing throughout the planning period or completed on an annual basis, while others will seek to be completed by FY 24-25. For specific timeframes and metrics,

		please see the programs detailed in Section 8: Housing Plan.
Lower Income Unit Proximity to Transportation	Program H-1.A: Accessory Dwelling Units (ADUs) Program H-1.B: Technical Assistance to Developers Program H-2.A: Pursue State and Federal Funding for Affordable Housing Program H-2.B: Local Funding for Affordable Housing Program H-2.C: Facilitate Equitable Access to Affordable Housing for Underrepresented Residents Program H-2.E: Housing Choice Voucher Program Program H-2.G: Regional Collaboration on Affordable Housing Program H-2.H: Assist with the Development of Affordable Housing Program H-2.I: Advertise Available Resources Program H-2.J: Faith Based Properties Program H-3.A: Assistance to Extremely Low-income Households Program H-3.B: Housing Opportunities for Persons with Special Needs Program H-3.C: Senior Housing and Assisted Living Units Program H-3.D: Accessible Housing Design Program H-3.E: Affirmatively Further Fair Housing Program H-4.A: Carriage House Program Program H-4.B: Maintain Funding Mechanisms to Administer the City's Affordable Housing Resources Program H-5.D: Compliance with AB 139 Requirements - Emergency Shelters	Many programs will aim to be completed within one year from the time of Housing Element Certification. Some programs will be ongoing throughout the planning period or completed on an annual basis, while others will seek to be completed by FY 24-25. For specific timeframes and metrics, please see the programs detailed in Section 8: Housing Plan.
Resources for fair housing agencies and organizations	Program H-3.H: Collaboration with Community Based Organizations	To be completed within 12 months of the Housing Element certification.
Population with a Disability	Program H-1.B: Technical Assistance to Developers Program H-3.B: Housing Opportunities for Persons with Special Needs Program H-3.E: Affirmatively Further Fair Housing Program H-3.C: Senior Housing and Assisted Living Units Program H-3.D: Accessible Housing Design	Many programs will aim to be completed within one year from the time of Housing Element Certification. Some programs will be ongoing throughout the planning period or completed on an annual basis, while others will seek to be completed by FY 24-25. For specific timeframes and metrics,

		please see the programs detailed in Section 8: Housing Plan.
Exclusionary Housing Practices	<p>Program H-2.C: Facilitate Equitable Access to Affordable Housing for Underrepresented Residents</p> <p>Program H-3.B: Housing Opportunities for People with Special Needs</p> <p>Program H-3.E: Affirmatively Further Fair Housing</p>	<p>Many programs will aim to be completed within one year from the time of Housing Element Certification. Some programs will be ongoing throughout the planning period or completed on an annual basis, while others will seek to be completed by FY 24-25. For specific timeframes and metrics, please see the programs detailed in Section 8: Housing Plan.</p>



Appendix C: Glossary of Terms



Appendix C: Glossary of Housing Terms

Above-Moderate-Income Household. A household with an annual income usually greater than 120% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available legibility limits established by the U.S. Department of housing and Urban Development (HUD) for the Section 8 housing program.

Affirmatively Furthering Fair Housing (AFFH): Affirmatively Furthering Fair Housing (AFFH) is a legal requirement that federal agencies and federal grantees further the purposes of the Fair Housing Act. AFFH means "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.

Apartment. An apartment is one (1) or more rooms in an apartment house or dwelling occupied or intended or designated for occupancy by one (1) family for sleeping or living purposes and containing one (1) kitchen.

Assisted Housing. Generally multi-family rental housing, but sometimes single-family ownership units, whose construction, financing, sales prices, or rents have been subsidized by federal, state, or local housing programs including, but not limited to Federal state, or local housing programs including, but not limited to Federal Section 8 (new construction, substantial rehabilitation, and loan management set-asides), Federal Sections 213, 236, and 202, Federal Sections 221 (d) (3) (below-market interest rate program), Federal Sections 101 (rent supplement assistance), CDBG, FmHA Sections 515, multi-family mortgage revenue bond programs, local redevelopment and in lieu fee programs, and units developed pursuant to local inclusionary housing and density bonus programs.

Below-Market-Rate (BMR). Any housing unit specifically priced to be sold or rented to low- or moderate-income households for an amount less than the fair-market value of the unit. Both the State of California and the U.S. Department of Housing and Urban Development set standards for determining which households qualify as "low income" or "moderate income." (2) The financing of housing at less than prevailing interest rates.

Build-Out. That level of urban development characterized by full occupancy of all developable sites in accordance with the General Plan; the maximum level of development envisioned by the General Plan. Build-out does not assume that each parcel is developed to include all floor area or housing units possible under zoning regulations.

Community Development Block Grant (CDBG). A grant program administered by the U.S. Department of Housing and Urban Development (HUD) on a formula basis for entitled communities and administered by the State Department of Housing and Community Development (HCD) for non-entitled jurisdictions. This grant allots money to cities and counties for housing rehabilitation and community development, including public facilities and economic development.

Condominium. A structure of two or more units, the interior spaces of which are individually owned; the balance of the property (both land and building) is owned in common by the owners of the individual units. (See "Townhouse.")

Covenants, Conditions, and Restrictions (CC&Rs). A term used to describe restrictive limitations that may be placed on property and its use, and which usually are made a condition of holding title or lease.

Deed. A legal document which affects the transfer of ownership of real estate from the seller to the buyer.

Density Bonus. The allocation of development rights that allow a parcel to accommodate additional square footage or additional residential units beyond the maximum for which the parcel is zoned, usually in exchange for the provision or preservation of an amenity at the same site or at another location.

Density, Residential. The number of permanent residential dwelling units per acre of land. Densities specified in the General Plan may be expressed in units per gross acre or per net developable acre.

Developable Land. Land that is suitable as a location for structures and that can be developed free of hazards to, and without disruption of, or significant impact on, natural resource areas.

Down Payment. Money paid by a buyer from his own funds, as opposed to that portion of the purchase price which is financed.

Duplex. A detached building under single ownership that is designed for occupation as the residence of two families living independently of each other.

Dwelling Unit (DU). A building or portion of a building containing one or more rooms, designed for or used by one family for living or sleeping purposes, and having a separate bathroom and only one kitchen or kitchenette. See Housing Unit.

Elderly Housing. Typically, one- and two-bedroom apartments or condominiums designed to meet the needs of persons 62 years of age and older or, if more than 150 units, persons 55 years of age and older, and restricted to occupancy by them.

Emergency Shelter. A facility that provides immediate and short-term housing and supplemental services for the homeless. Shelters come in many sizes, but an optimum size is considered to be 20 to 40 beds. Supplemental services may include food, counseling, and access to other social programs. (See "Homeless" and "Transitional Housing.")

Extremely Low-Income Household. A household with an annual income equal to or less than 30% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

Fair Market Rent. The rent, including utility allowances, determined by the United States Department of Housing and Urban Development for purposed of administering the Section 8 Program.

Family. (1) Two or more persons related by birth, marriage, or adoption [U.S. Bureau of the Census]. (2) An Individual or a group of persons living together who constitute a bona fide single-family housekeeping unit in a dwelling unit, not including a fraternity, sorority, club, or other group of persons occupying a hotel, lodging house or institution of any kind [Governor's Office of Planning and Research, General Plan Guidelines].

General Plan. A comprehensive, long-term plan mandated by State Planning Law for the physical development of a city or county and any land outside its boundaries which, in its judgment, bears relation to its planning. The plan shall consist of seven required elements: land use, circulation, open space, conservation, housing, safety, and noise. The plan must include a statement of development policies and a diagram or diagrams illustrating the policies.

Goal. A general, overall, and ultimate purpose, aim, or end toward which the City will direct effort.

Green Building. Green or sustainable building is the practice of creating healthier and more resource-efficient models of construction, renovation, operation, maintenance, and demolition. (US Environmental Protection Agency)

Historic Preservation. The preservation of historically significant structures and neighborhoods until such time as, and in order to facilitate, restoration and rehabilitation of the building(s) to a former condition.

Historic Property. A historic property is a structure or site that has significant historic, architectural, or cultural value.

Household. All those persons—related or unrelated—who occupy a single housing unit. (See “Family.”)

Housing and Community Development Department (HCD). The State agency that has principal responsibility for assessing, planning for, and assisting communities to meet the needs of low-and moderate-income households.

Housing Element. One of the seven State-mandated elements of a local general plan, it assesses the existing and projected housing needs of all economic segments of the community, identifies potential sites adequate to provide the amount and kind of housing needed, and contains adopted goals, policies, and implementation programs for the preservation, improvement, and development of housing. Under State law, Housing Elements must be updated every five years.

Housing Payment. For ownership housing, this is defined as the mortgage payment, property taxes, insurance and utilities. For rental housing this is defined as rent and utilities.

Housing Ratio. The ratio of the monthly housing payment to total gross monthly income; also called Payment-to-Income Ratio or Front-End Ratio.

Housing Unit. The place of permanent or customary abode of a person or family. A housing unit may be a single-family dwelling, a multi-family dwelling, a condominium, a modular home, a mobile home, a cooperative, or any other residential unit considered real property under State law.

Housing and Urban Development, U.S. Department of (HUD). A cabinet-level department of the federal government that administers housing and community development programs.

Implementing Policies. The City’s statements of its commitments to consistent actions.

Implementation. Actions, procedures, programs, or techniques that carry out policies.

Infill Development. The development of new housing or other buildings on scattered vacant lots in a built-up area or on new building parcels created by permitted lot splits.

Jobs-Housing Balance. A ratio used to describe the adequacy of the housing supply within a defined area to meet the needs of persons working within the same area. The General Plan uses SANDAG's definition which is a job total equal to 1.2 times the number of housing units within the area under consideration.

Land Use Classification. A system for classifying and designating the appropriate use of properties.

Live-Work Units. Buildings or spaces within buildings that are used jointly for commercial and residential purposes where the residential use of the space is secondary or accessory to the primary use as a place of work.

Low-Income Household. A household with an annual income usually no greater than 51%-80% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

Low-income Housing Tax Credits. Tax reductions provided by the federal and State governments for investors in housing for low-income households.

Manufactured Housing. Residential structures that are constructed entirely in the factory, and which since June 15, 1976, have been regulated by the federal Manufactured Home Construction and Safety Standards Act of 1974 under the administration of the U.S. Department of Housing and Urban Development (HUD). (See "Mobile home" and "Modular Unit.")

Mixed-Use. Properties on which various uses, such as office, commercial, institutional, and residential, are combined in a single building or on a single site in an integrated development project with significant functional interrelationships and a coherent physical design. A "single site" may include contiguous properties.

Moderate-Income Household. A household with an annual income usually no greater than 81%-120% of the area median family income adjusted by household size, as determined by a survey of incomes conducted by a city or a county, or in the absence of such a survey, based on the latest available eligibility limits established by the U.S. Department of Housing and Urban Development (HUD) for the Section 8 housing program.

Monthly Housing Expense. Total principal, interest, taxes, and insurance paid by the borrower on a monthly basis. Used with gross income to determine affordability.

Multiple Family Building. A detached building designed and used exclusively as a dwelling by three or more families occupying separate suites.

Ordinance. A law or regulation set forth and adopted by a governmental authority, usually a city or county.

Overcrowded Housing Unit. A housing unit in which the members of the household, or group are prevented from the enjoyment of privacy because of small room size and housing size. The U.S. Bureau of Census defines an overcrowded housing unit as one which is occupied by more than one person per room.

Parcel. A lot or tract of land.

Planning Area. The area directly addressed by the general plan. A city's planning area typically encompasses the city limits and potentially annexable land within its sphere of influence.

Policy. A specific statement of principle or of guiding actions that implies clear commitment but is not mandatory. A general direction that a governmental agency sets to follow, in order to meet its objectives before undertaking an action program. (See “Program.”)

Poverty Level. As used by the U.S. Census, families and unrelated individuals are classified as being above or below the poverty level based on a poverty index that provides a range of income cutoffs or “poverty thresholds” varying by size of family, number of children, and age of householder. The income cutoffs are updated each year to reflect the change in the Consumer Price Index.

Program. An action, activity, or strategy carried out in response to adopted policy to achieve a specific goal or objective. Policies and programs establish the “who,” “how” and “when” for carrying out the “what” and “where” of goals and objectives.

Redevelop. To demolish existing buildings; or to increase the overall floor area existing on a property; or both; irrespective of whether a change occurs in land use.

Regional. Pertaining to activities or economies at a scale greater than that of a single jurisdiction and affecting a broad geographic area.

Regional Housing Needs Assessment. A quantification by the local council of governments of existing and projected housing need, by household income group, for all localities within a region.

Rehabilitation. The repair, preservation, and/or improvement of substandard housing.

Residential. Land designated in the General Plan and zoning ordinance for building consisting of dwelling units. May be improved, vacant, or unimproved. (See “Dwelling Unit.”)

Residential Care Facility. A facility that provides 24-hour care and supervision to its residents.

Residential, Multiple Family. Usually three or more dwelling units on a single site, which may be in the same or separate buildings.

Residential, Single-Family. A single dwelling unit on a building site.

Retrofit. To add materials and/or devices to an existing building or system to improve its operation, safety, or efficiency. Buildings have been retrofitted to use solar energy and to strengthen their ability to withstand earthquakes, for example.

Rezoning. An amendment to the map to effect a change in the nature, density, or intensity of uses allowed in a zoning district and/or on a designated parcel or land area.

Second Unit. A self-contained living unit, either attached to or detached from, and in addition to, the primary residential unit on a single lot. “Granny Flat” is one type of second unit.

Section 8 Rental Assistance Program. A federal (HUD) rent-subsidy program that is one of the main sources of federal housing assistance for low-income households. The program operates by providing “housing assistance payments” to owners, developers, and public housing agencies to make up the difference between the “Fair Market

Rent” of a unit (set by HUD) and the household’s contribution toward the rent, which is calculated at 30% of the household’s adjusted gross monthly income (GMI). “Section 8” includes programs for new construction, existing housing, and substantial or moderate housing rehabilitation.

Shared Living Facility. The occupancy of a dwelling unit by persons of more than one family in order to reduce housing expenses and provide social contact, mutual support, and assistance. Shared living facilities serving six or fewer persons are permitted in all residential districts by Section 1566.3 of the California Health and Safety Code.

Single-Family Dwelling, Attached. A dwelling unit occupied or intended for occupancy by only one household that is structurally connected with at least one other such dwelling unit. (See “Townhouse.”)

Single-Family Dwelling, Detached. A dwelling unit occupied or intended for occupancy by only one household that is structurally independent from any other such dwelling unit or structure intended for residential or other use. (See “Family.”)

Single Room Occupancy (SRO). A single room, typically 80-250 square feet, with a sink and closet, but which requires the occupant to share a communal bathroom, shower, and kitchen.

Subsidize. To assist by payment of a sum of money or by the granting to terms or favors that reduces the need for monetary expenditures. Housing subsidies may take the forms of mortgage interest deductions or tax credits from federal and/or state income taxes, sale or lease at less than market value of land to be used for the construction of housing, payments to supplement a minimum affordable rent, and the like.

Substandard Housing. Residential dwellings that, because of their physical condition, do not provide safe and sanitary housing.

Supportive Housing. Housing with no limit on length of stay, that is occupied by the target population as defined in California Health and Safety Code Section 53260(d), and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community. “Target population” means adults with low incomes having one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health conditions, or individuals eligible for services provided under the Lanterman Developmental Disabilities Services Act and may, among other populations, include families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, or homeless people. [California Health and Safety Code Sections 50675.14(b) and 53260(d)]

Target Areas. Specifically, designated sections of the community where loans and grants are made to bring about a specific outcome, such as the rehabilitation of housing affordable by Very-Low and Low-income households.

Tax Increment. Additional tax revenues that result from increases in property values within a redevelopment area. State law permits the tax increment to be earmarked for redevelopment purposes but requires at least 20 percent to be used to increase and improve the community’s supply of very low- and low-income housing. Anaheim currently allocates 30 percent of its tax increment to increase and improve the community’s supply of very low- and low-income housing.

Tenure. A housing unit is owner-occupied if the owner or co-owner lives in the unit, even if it is mortgaged or not fully paid for. A cooperative or condominium unit is owner-occupied only if the owner or co-owner lives in it. All other occupied units are classified as renter-occupied including units rented for cash rent and those occupied without payment of cash rent.

Townhouse. A townhouse is a dwelling unit located in a group of three (3) or more attached dwelling units with no dwelling unit located above or below another and with each dwelling unit having its own exterior entrance.

Transitional Housing. Shelter provided to the homeless for an extended period, often as long as 18 months, and generally integrated with other social services and counseling programs to assist in the transition to self-sufficiency through the acquisition of a stable income and permanent housing. (See “Homeless” and “Emergency Shelter.”)

Undevelopable. Specific areas where topographic, geologic, and/or superficial soil conditions indicate a significant danger to future occupants and a liability to the City.

Acronyms Used

ACS: American Community Survey
BMPs: Best Management Practices
CALTRANS: California Department of Transportation
CEQA: California Environmental Quality Act
CHAS: Comprehensive Housing Affordability Strategy
CIP: Capital Improvement Program
DDS: Department of Developmental Services
DIF: Development Impact Fee
DU/AC: Dwelling Units Per Acre
EDD: California Employment Development Department
FAR: Floor Area Ratio
FEMA: Federal Emergency Management Agency
HCD: Department of Housing and Community Development
HOA: Homeowners Association
HUD: Department of Housing and Urban Development
LAFCO: Local Agency Formation Commission
MFI: Median Family Income
NPDES: National Pollutant Discharge Elimination System
RTFH: Regional Task Force on the Homeless
RTP: Regional Transportation Plan
SANDAG: San Diego Association of Governments
SPA: Sectional Planning Area
STF: Summary Tape File (U.S. Census)
TOD: Transit-Oriented Development
TDM: Transportation Demand Management
TSM: Transportation Systems Management
WCP: Water Conservation Plan

