

Fair Housing Findings on the Mid-City Plan Update

Fifteen findings for City Planning, the Council offices covering the plan area, and the Mayor's office. Each finding is one page and stands on its own.

WHY THIS PLAN UPDATE IS UNLIKE ANY OTHER

The plan being replaced was adopted on 4 August 1998. AB 686, the Baker Settlement and the State's Opportunity Map and Neighborhood Change methods all came afterward, so this is the first time these four communities have been planned under the fair housing law that now governs the work.

Since 2016 the City has comprehensively updated twelve community plans. Those twelve cover 96 census tracts, 63 of them in the State's High or Highest Resource tiers, and 14 carrying a neighborhood change designation. **This plan covers 30 tracts. One is High Resource. Twenty-three sit in the State's lowest tier, and nine carry a change designation, double the citywide rate.** Nine of the twelve earlier plans contain no change area at all. Measured on the two instruments the State itself uses, Mid-City is close to the inverse of everything the City has planned in the last decade.

The same boundary holds one of the two clusters of high segregation and poverty the City's own Fair Housing Appendix identifies, and one of its three Racially Concentrated Areas of Affluence. The fair housing content of this plan therefore carries weight no recent update did. The draft asserts that content; the analysis behind it is not in the document. Every gap named below can be closed before adoption with data the City already holds, without reducing a single home.

THE FINDINGS

A. THE FAIR HOUSING TEST THE PLAN DOES NOT RUN

1. **Say what this plan cannot accomplish inside its boundary**, and where the City will act instead.
2. **Perform and publish the AFFH analysis the draft asserts** at printed page 14.
3. **Publish residential capacity by community.** The total is on page 15; the split is not.
4. **Publish a fair housing distribution table.** Affordable homes are permitted where opportunity is lowest.
5. **Say what "to the maximum extent feasible" means** in Policy 2.15; give Policies 2.16 and 2.17 a date.
6. **Make the anti-displacement policies measurable:** baseline, target, date, annual report.

B. WHAT THE STATE'S INSTRUMENTS MISS, AND WHAT THE PLAN MUST HOLD

7. **Screen for displacement beyond the State's designations.** Eastern Area carries none.
8. **Hold access and stability at once.** Kensington-Talmadge and Normal Heights need different things.
9. **Set a NOAH baseline at 60 and 80 percent** of median family income, and report against it.
10. **Report the loss of children as a plan condition:** 43 percent of the city's entire loss.

C. WHERE THE CAPACITY IS PLACED

11. **Complete the committed air and noise assessment;** set intensity by measured roadway volume.
12. **Site transit villages where transit demand is measured;** re-justify College Grove and Federal at Euclid.
13. **Reconcile Figure 2-1 with Figure 5-1.** The map does not deliver the framework's transition.
14. **Address corridor conditions alongside intensity:** 316 pedestrian injury collisions, most on these corridors.

D. PROCESS

15. **Publish engagement by community**, and return to the communities the process did not reach.

The City should say plainly what this plan can and cannot accomplish, and where in the rest of the city it intends to create the opportunity access that Mid-City residents cannot reach from here.

Twenty-one of the thirty tracts in this plan area have no High or Highest Resource neighborhood on any of their borders. For eleven of them, every neighboring tract is in the State's lowest tier as well. A plan drawn only inside this boundary cannot fix that on its own.

EVIDENCE

The Opportunity Map describes the tier each tract sits in. It does not describe what sits next to it, and for a resident that distinction governs daily life: the school across the boundary, the job a bus ride away, the neighborhood a family could move to without leaving the area they know. Twenty-nine of thirty tracts here are Low or Moderate Resource. Against a city that holds 170 High or Highest Resource tracts out of 311, this plan boundary holds one, in Normal Heights.

Community	Tracts	No High or Highest neighbor	Every neighbor in the lowest tier
City Heights	15	11	7
Eastern Area	7	7	4
Kensington-Talmadge	4	2	0
Normal Heights	4	1	0
Mid-City plan area	30	21	11

Tract adjacency computed on 2020 Census geometry with a 30-metre shared-boundary threshold; results are unchanged at any threshold below 100 metres. Opportunity tiers are HCD and TCAC's 2026 classifications. This is a measurement of the map, not a model.

- **Every one of Eastern Area's seven tracts** has no higher-opportunity neighborhood on any border. That community is not only in the lowest tier; it is enclosed by it.
- What this plan *can* do inside its boundary is decide where its own capacity and affordability requirements land (Findings 3 and 4), whether its higher-opportunity communities absorb any of the affordable obligation (Finding 8), and whether the communities carrying the burden today carry more of it tomorrow.
- What it cannot do is deliver access to High or Highest Resource neighborhoods, because there are almost none inside the line. That depends on capacity created in other community plans, and the draft should say so rather than leave the implication that it can solve the problem within its own boundary.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Figure 2-1, Planned Land Uses, printed p. 13, with the designations at pp. 16 to 25; the fair housing statement at printed p. 14. Also **Introduction**, General Plan Housing Element paragraph, printed p. 10.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 3.3 to 3.5 and request 8.7.

Perform and publish the affirmatively furthering fair housing analysis the draft says it is carrying out.

The draft states, in its own words, that the City is reversing patterns of segregation and reducing concentrations of poverty, consistent with local, state and federal fair housing law. The spatial analysis that would show it is not in the document. This is checkable by anyone in ten minutes and depends on no figure we produced.

WHAT THE DRAFT SAYS, AT PRINTED PAGE 14

"The City is committed to eliminating disparities in housing access and affirmatively furthering fair housing by working to reverse patterns of segregation, reducing concentrations of poverty, and ensuring that people of all incomes have the choice to live in communities with access to opportunity free from discrimination, consistent with local, state, and federal fair housing laws."

THE ANALYSIS THE STATEMENT CALLS FOR, AND WHERE IT IS ABSENT

- No analysis showing where the plan's residential capacity lands against the State's Opportunity Map.
- No distribution of affordable capacity, or of existing affordable stock, by community planning area.
- No test of the land use map (Figure 2-1) against the geography of need: the Neighborhood Change designations, the City's own RCAA and RECAP designations, or the tier-based commitment the City entered in March 2025.
- No statement, where the land use map does advance fair housing, of how it does so, in the plan itself rather than by reference.

WHY THE INSTRUMENTS ARE ALREADY IN HAND

Every instrument such an analysis would use is adopted and public: California HCD and TCAC's 2026 Opportunity Map, the State's Neighborhood Change designations, the City's Housing Element Fair Housing Appendix, and the Baker Settlement's reporting commitment. The plan could have measured itself against any of them. None appears as a test in the draft. A rationale a resident cannot find and check is not a rationale the public can hold the City to.

The draft's anti-displacement and equity policies are more specific than most community plans provide, and this comment does not dispute them. The point is narrower: the document asserts a fair housing outcome and does not show its work. The land use concepts presented to the Planning Commission in March 2026 included one named "Transit Villages, Corridors and Neighborhoods + Fair Housing"; the draft does not say what that addition consisted of or whether it was carried forward.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. "Balanced and Equitable Communities," printed p. 14. Also **Introduction**, General Plan Housing Element paragraph, printed p. 10.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 4.2 and 4.3, request 8.3, Chapter 9, question 4. Quote the plan at full length; a shortened version drops the clause that ties the commitment to fair housing law.

Publish residential capacity by community planning area. The plan-area total is already on page 15; the split among the four communities is not.

Table 2-1 puts the plan area's possible net new homes at 42,000 over the 30-year horizon, from 53,500 to 95,500. The draft does not say how much of that lands in City Heights, Eastern Area, Kensington-Talmadge or Normal Heights. Until it does, no distribution question in this comment can be answered, including by the City.

EVIDENCE

Table 2-1, Development Potential (printed p. 15)	Year 2025	Possible net future change	Horizon total
Population (people)	138,000	89,000	227,000
Residential (homes)	53,500	42,000	95,500
Non-residential (square feet)	13,300,000	1,900,000	15,200,000

The draft's contents and text call this Table 2-1; its caption on page 15 reads Table 2-2. The City's public materials describe the update as capacity for about 30,000 homes. Both figures are the City's; no document reconciles them, and this comment does not adopt either as a premise.

- **Policy 2.8 encourages "the equitable distribution of affordable housing throughout Mid-City."** Equitable distribution is a claim about shares. Without capacity by community there is no denominator, and the commitment cannot be evaluated by the public or by the City.
- The four communities are not interchangeable. City Heights holds roughly half the plan area's population and its highest crowding; Normal Heights holds the only High Resource tract; Kensington-Talmadge holds the affluence concentration; Eastern Area is the one community where population growth has outpaced housing growth. A single total conceals which of them is being asked to carry the growth.
- The City already holds the figure. Table 2-1 was built by summing parcel-level capacity across the land use map; the same computation grouped by community planning area produces the four-row table this comment asks for.
- Capacity is what the map allows, not a forecast. Three of the four communities added homes while losing population, and the plan area permits at roughly half the citywide rate. Publishing capacity by community asks what the plan assumes, not what the market will deliver.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Table 2-1 (captioned Table 2-2), "Planning Horizon," printed p. 15; Policy 2.8, printed p. 34.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 1.4 and 4.4, request 8.2, Chapter 9, question 5.

Publish a Fair Housing Distribution and Opportunity table for the four communities, because affordable housing in this plan area is being permitted where opportunity is lowest.

City Heights, every one of whose fifteen tracts sits in the State's lowest opportunity tier, is the only community of the four permitting affordable homes above the citywide rate. The three communities that hold every Moderate and High Resource tract in the plan area permit at 18 to 42 percent of that rate.

EVIDENCE

Below-moderate homes permitted per 1,000 existing	
City of San Diego	11.8
Mid-City plan area	7.6
City Heights (15 Low Resource tracts)	12.3
Kensington-Talmadge	4.9
Normal Heights	2.6
Eastern Area	2.1

Current RHNA cycle, HCD Annual Progress Report Table A2, against existing units. Permitted, not completed.

- City Heights holds **49 percent** of the plan area's homes, **63 percent** of its existing deed-restricted homes, and **80 percent** of its current-cycle below-moderate permits.
- Mid-City as a whole permits **32.9 homes per 1,000 existing against 62.4 citywide**, and about seven in ten of those permits are accessory dwelling units, against roughly two in ten citywide. In Eastern Area it is 99 percent ADUs, with no homes permitted in buildings of five or more.
- This is a distribution finding and it holds regardless of who builds.

Affordable housing in City Heights should be preserved and expanded. Meeting need where lower-income households already live and expanding access to higher-opportunity neighborhoods are both fair housing objectives, and they are complements, so this is not a finding that City Heights has too much. The finding is that the plan area's three higher-opportunity communities are producing almost none, inside one plan boundary, while Policy 2.8 encourages equitable distribution and the plan publishes no figure against which that can be measured.

The table the City should publish, for each of the four communities: existing homes, existing deed-restricted homes, current-cycle affordable permits, proposed capacity and affordable capacity, opportunity-tier composition, RCAA status, environmental burden and transit access. Publishing it is the first half of the test. Explaining why the distribution it shows is equitable, against need, existing concentration, opportunity tier and development feasibility, is the second.

A question that follows from a commitment already made. In the March 2025 Baker Settlement the City agreed to include data that demonstrates that by at least 2028, at least 70 percent of affordable housing projects in the City are permitted in Moderate, High or Highest Resource areas. The plan area's seven tracts at Moderate or above sit entirely in Kensington-Talmadge and Normal Heights, and the draft does not say what share of affordable homes those seven are expected to carry.

Say what "to the maximum extent feasible" means in Policy 2.15, and turn Policies 2.16 and 2.17 from support and consideration into a trigger, a date and published data.

Policy 2.15 supports onsite very-low and low-income homes in market-rate projects "rather than paying in-lieu fees, to the maximum extent feasible." The plan does not say who determines feasibility, against what criteria, or how the public would learn the result. The difference between an onsite home and a fee matters most in Kensington-Talmadge, which permits affordable homes at 4.9 per 1,000 existing against 11.8 citywide.

WHAT THE THREE POLICIES SAY, AT PRINTED PAGE 35

- **2.15** "Support inclusion of onsite very-low and low-income affordable housing within market-rate residential and mixed-use projects rather than paying in-lieu fees, to the maximum extent feasible."
- **2.16** "Support evaluation of inclusionary requirements to ensure the equitable provision of affordable housing in a manner that affirmatively furthers fair housing and advances anti-displacement goals in Mid-City."
- **2.17** "Consider local housing conditions in Mid-City, including displacement risk, transit access, development feasibility, and affordable housing needs, as part of future updates to the City's Inclusionary Housing Ordinance."

WHAT THE ASK IS, AND WHAT IT IS NOT

State law protects the in-lieu fee option, and this comment does not ask the City to remove it. AB 1505 (2017), now Government Code section 65850.01, restored the City's authority to apply inclusionary requirements to rental housing and requires that any such ordinance offer alternative means of compliance, including a fee. A demand to eliminate the fee would ask for something the statute forbids.

What the statute leaves available is a stated preference, applied through published criteria and reported afterward. That is what this finding asks for: a named decision-maker for the feasibility determination, the criteria it uses, and a public record of how often onsite homes were delivered against how often a fee was paid, by community.

The draft already points at this work and stops short of committing to it. Policies 2.16 and 2.17 are stated as support and consideration, directed at a future Inclusionary Ordinance update rather than at this plan. The question for the second draft is what would trigger that evaluation, when it would occur, and against what published data. Finding 4 supplies the data that would make the evaluation possible.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Policies 2.15, 2.16 and 2.17, "Affordable Housing," printed p. 35. **Implementation,** Chapter 8, for where a reporting mechanism would live.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, request 8.6; AB 1505 (2017), Government Code section 65850.01; San Diego Municipal Code Chapter 14, Article 2, Division 13.

Make the anti-displacement commitments measurable: a baseline, a target, a date and an annual public report, without changing a single policy.

Policies 2.9 through 2.18 are more specific than most community plans provide. They name tools rather than gesturing at intent. None of them has a baseline, a target or a reporting mechanism, so no one, including the City, can determine whether they are working.

WHAT THE DRAFT COMMITS TO, AT PRINTED PAGES 34 AND 35

Relocation assistance for tenants of homes to be demolished or converted (2.9). Preserving residents' ability to continue living in the community (2.10). Extended notice and options to return to new affordable homes, to the maximum extent feasible, when demolition is proposed (2.11). Community land trust and acquisition programs (2.12). Production and preservation of affordable housing (2.13). Affordable homeownership for local residents (2.14). Onsite affordable homes over fees (2.15). And, in 2.8, the equitable distribution of affordable housing throughout Mid-City. **This is a real commitment set and this comment does not dispute it.**

WHAT IS MISSING

- **A baseline.** The plan publishes no starting figure for any of the conditions these policies address: existing affordable stock by community, crowding, household size, rent trajectory, the under-18 population, or the share of rentals affordable at 60 and 80 percent of median family income (Finding 9).
- **A target and a date.** A commitment to "encourage" equitable distribution cannot be met or missed. A share, a year and a community-level breakdown can be.
- **A report.** Chapter 8, Implementation, is where the plan's implementing mechanisms sit. An annual report on displacement and affordable housing conditions, by community, belongs there, alongside the Housing Element policy the draft itself cites at Table 2-3: HE-H.1, "Monitor affordable rental units at risk of converting to market rents."

The measures in Findings 7, 9 and 10 (a broader displacement screen, the NOAH baseline, and the loss of children) are the content of that baseline. All of them are available to the City today from Census, HCD Annual Progress Report and its own permit data, at community planning area resolution.

A commitment that cannot be evaluated cannot be enforced, by the public or by the City. Adding the measurement changes none of the policies and would make each of them mean something.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Policies 2.8 to 2.18, printed pp. 34 to 35; Table 2-3, Relevant General Plan Policies, HE-H.1, printed p. 32. **Implementation,** Chapter 8, from printed p. 153.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 4.1 and 4.4, request 8.5.

Supplement the State's Neighborhood Change designations with a broader displacement screen, applied at community and corridor level, using population change, crowding, rent trajectory and racial composition.

Eastern Area carries zero neighborhood change designations across all seven of its tracts. Over the same period it grew 15.4 percent, its White non-Hispanic population fell 26.0 percent, and its population of color grew 42.1 percent. A plan that uses the State's designations as its scoping tool would miss this community entirely.

EVIDENCE

	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	District 9	City
Neighborhood change designation rate	26.7% (4 of 15)	0.0% (0 of 7)	25.0% (1 of 4)	100% (4 of 4)	36.4%	14.1%
Population change, 2000 to current	-8.0%	+15.4%	+2.9%	-4.4%	-1.7%	+14.1%
Current crowding rate	15.7%	7.7%	2.3%	2.8%	10.0%	5.8%
Rent change, population-weighted (State's marker 64.5%)	73.7%	61.8%	65.2%	83.1%	70.1%	64.8%
CalEnviroScreen 5.0 percentile	74.0	62.8	32.0	18.1	58.3	37.1

Census 2000 against ACS 2020-2024. Designations are HCD's 2026 Neighborhood Change pathways. Sourcing by cell in the review's Chapter 18.

- **City Heights is designated on 4 of 15 tracts, below its own district's rate**, despite the plan area's highest crowding (more than double the citywide rate), its steepest population loss, its highest environmental burden, and rent growth well above the State's threshold.
- **Eastern Area crosses one of HCD's three rate-of-change thresholds**, the fewest of the four, and so registers nothing. Growth is not the same as stability; this community grew while its composition changed substantially, and the State's instrument records none of it.
- A plan scoped by State designations would correctly prioritise Normal Heights, under-prioritise City Heights, and miss Eastern Area. The draft's own equity chapter names displacement from past infrastructure decisions; the same attention belongs on the displacement the land use map could produce.

The data documents the compositional shift and its absence from the detection instrument. It does not establish why the shift occurred, and this comment does not claim it does. **The test for the second draft:** does the anti-displacement analysis supplement State designations with these four measures, and is that supplement reflected in corridor-level implementation guidance?

Hold both fair housing obligations at once: make Kensington-Talmadge reachable at a broader range of incomes, and hold Normal Heights' higher-opportunity status open to the residents already there.

Inside this plan boundary the duty to expand access to opportunity lands on two communities, not one, and they need different things. Kensington-Talmadge holds the affluence concentration and District 9's only Persistent RCAA tract. Normal Heights holds the plan area's single High Resource tract, and has lost more than three quarters of its Black residents since 2000.

KENSINGTON-TALMADGE: ACCESS

- Four tracts, entirely in District 9. Three Moderate Resource, one Low Resource, **no High Resource tract**.
- Current median home value **\$1,125,844**, the highest of the four, about \$254,500 above the citywide median of tract medians.
- Tract 20.01 is **Persistent RCAA** by the Lab's own classification and separately named as Kensington in the City's own Fair Housing Appendix, one of three Racially Concentrated Areas of Affluence in the city.
- The community average describes nobody in it. Two tracts sit near \$182,000 in household income with about a quarter renters; the other two near \$79,000 with over 80 percent renters. **The dividing line runs through the middle of the community, not around it.**
- Permits affordable homes at **4.9 per 1,000 existing**, against 11.8 citywide.

NORMAL HEIGHTS: STABILITY

- Four tracts, entirely in District 9. One High Resource, three Moderate; **the plan area's only High Resource tract** is here (tract 19).
- Black non-Hispanic population **-76.6 percent**, 1,827 to 427, the steepest decline of any community planning area in the city with 500 or more Black residents in 2000. The next steepest is Southeastern San Diego at -48.7.
- **All four tracts carry a neighborhood change designation**, two of them all three pathway types at once. Rent growth 83.1 percent, the widest margin above the State's marker in the plan area.
- Lost 55 percent of its children; fewer than one household in twelve has been there since 2000.
- Permits affordable homes at **2.6 per 1,000 existing**.

State law under AB 686 asks cities not only to avoid concentrating affordable housing in lower-opportunity areas but to affirmatively promote access to higher-opportunity ones. Here that means two different questions. **What planning tools apply in Kensington-Talmadge specifically** to make its housing reachable at a broader range of incomes? **And what applies in Normal Heights** to hold its higher-opportunity status open to the residents already there, while it changes faster than any community in the plan area? The draft answers neither by community; Policy 2.8 speaks of Mid-City as one place.

The population decline and the designation pattern in Normal Heights describe the same geography over the same period. This comment does not claim the State's designations respond to the Black population decline specifically.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Policy 2.8, printed p. 34; Figure 2-1 as it applies to Kensington-Talmadge and Normal Heights, printed p. 13 and pp. 16 to 25.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 2.4, 2.5 and 5.3; Chapter 9, question 4; Kensington-Talmadge and Normal Heights community reports (Appendices 3 and 4 to the review); City of San Diego Housing Element Fair Housing Appendix.

Set a baseline for naturally occurring affordable housing in each of the four communities, at both 60 and 80 percent of median family income, and report against it. The two thresholds tell different stories.

At 80 percent of median family income Mid-City is still a broadly affordable place: 79.8 percent of its rentals, against 53.1 percent citywide. At 60 percent it has stopped being one: 83.0 percent of rentals in 2000, 46.9 percent now, a loss of 11,028 homes. A preservation target set at 80 percent would report most of this stock as intact.

EVIDENCE

Share of rentals affordable at each threshold	2000	Now	Change (points)	Floor	Homes
60 percent of MFI (rent at or below \$805.50 then, \$1,792.50 now)					
City Heights	89.64%	52.37%	-37.3	-20.9	-7,012
Eastern Area	61.11%	38.03%	-23.1	-10.6	-823
Kensington-Talmadge	76.23%	38.48%	-37.8	-24.1	-1,138
Normal Heights	85.24%	43.58%	-41.7	-21.1	-2,054
Mid-City, all four	83.01%	46.88%	-36.1	-20.2	-11,028
<i>City of San Diego</i>	<i>55.00%</i>	<i>27.57%</i>	<i>-27.4</i>	<i>-18.2</i>	
80 percent of MFI (rent at or below \$1,074.00 then, \$2,390.00 now)					
City Heights	97.49%	84.76%	-12.7	-7.6	-2,493
Eastern Area	87.91%	70.38%	-17.5	-8.2	4,437 / 4,184*
Kensington-Talmadge	90.43%	71.56%	-18.9	-11.5	-316
Normal Heights	96.11%	78.90%	-17.2	-12.0	-920
Mid-City, all four	95.00%	79.75%	-15.3	-9.1	-3,982
<i>City of San Diego</i>	<i>77.12%</i>	<i>53.05%</i>	<i>-24.1</i>	<i>-15.3</i>	

A rental counts as affordable when its gross rent is at or below 30 percent of that share of HUD median family income for San Diego County. Units, never households: the Census reports what a home rents for, not who lives in it. Census 2000 against ACS 2020-2024; denominator is renter-occupied homes paying cash rent. **Change** recomputes from the two shares beside it. **Floor** is the change in share under the least favourable treatment of the rent bracket containing the threshold in both years, the figure that survives an adversarial reading. *Eastern Area at 80 percent: direction not established; both years' counts are stated. Mid-City lost more than the city at 60 percent (-36.1 points against -27.4) and less at 80 (-15.3 against -24.1); it began the period at 95 percent affordable at 80.

- The draft names preservation of "naturally occurring affordable housing" as an important component of accommodating growth (printed p. 15) and cites HE-H.1 on monitoring at-risk rentals (Table 2-3, printed p. 32). It publishes no Mid-City baseline against which either could be tracked.
- These are stock figures: how much of the rental stock rents below a threshold, not where anyone went or why. Community level is the reportable unit; tract-level shares carry bands too wide to publish.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. "Anti-Displacement and Affordable Housing," printed p. 15; Table 2-3, HE-H.1, printed p. 32; Policy 2.13, printed p. 35.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, section 5.5, Tables 5.2 and 5.3; the four community reports.

Report the plan area's loss of children as a plan condition, and carry it into the anti-displacement baseline. A community that cannot keep its families is not one a 30-year plan can treat as stable.

The plan area lost 15,350 residents under 18 since 2000, a 34.3 percent decline against 12.3 percent citywide. These thirty tracts are about a tenth of the city's, and they account for 43 percent of San Diego's entire loss of children. The Introduction reports population and housing growth (Table 1-2, Figure 1-3) without saying who left.

EVIDENCE

Age composition, 2000 to current	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	City
Under-18 share of population	36.6% to 23.0%	25.6% to 21.8%	20.2% to 15.3%	22.2% to 10.4%	24.4% to 18.8%
Under-18 change, count	-12,878	-128	-613	-1,731	-35,591
65 and over, share	5.3% to 10.6%	11.6% to 12.7%	11.0% to 15.1%	6.9% to 10.2%	10.6% to 14.9%
Total population change	-8.0%	+15.4%	+2.9%	-4.4%	+14.1%
Housing unit growth	+6.3%	+9.9%	+11.3%	+7.0%	+21.7%

Census 2000 against ACS 2020-2024, by direct query against age-bracket counts; shares from each community report's Section 7.

- **City Heights lost 12,878 children, the largest absolute loss of any community planning area in the city.** Its housing units grew 6.3 percent while its population fell 8.0 percent; occupied homes rose about 4 percent while average household size fell from 3.36 to 2.96. City Heights gained households and lost people.
- **Normal Heights lost 55 percent of its children;** its under-18 share fell from 22.2 to 10.4 percent, the lowest in the plan area.
- Three of the four communities added homes while losing population. Building alone has not held these communities together, which is a caution against reading capacity as a fair housing answer in itself.
- The age pattern in City Heights and Normal Heights is the young-families-leaving shape: steep under-18 declines paired with rising 65-and-over shares. Kensington-Talmadge shows a milder under-18 decline and now carries the largest 65-and-over share in the plan area, an aging pattern rather than a pressure-driven one.

What the data does not establish is why household size fell. Smaller households forming, larger households leaving, and turnover replacing large households with small ones all produce this pattern, and this comment does not choose among them. What it asks is that the plan report the condition, by community, and treat the retention of families as something its anti-displacement policies (Finding 6) are measured against.

IN THE DRAFT PLAN

Introduction. Table 1-2, City of San Diego and Mid-City Population Change 2000 to 2024, and Figure 1-3, printed p. 9.
Land Use and Economic Prosperity, "Anti-Displacement," printed pp. 14 to 15.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, section 2.6 (items 2, 3 and 6) and Table 2.2; City Heights and Normal Heights community reports, Section 7.

Complete the air and noise assessment the City committed to in August 2025 before the highest-density designations are finalised, and set residential intensity by measured roadway volume rather than one corridor treatment across a tenfold range.

The Draft Ideas Report of August 2025 said the additional density between El Cajon Boulevard and University Avenue and along SR-15 would be studied "while assessing considerations related to fair housing, air and noise pollution, and feasibility testing." The density is in the first draft. The assessment is not.

EVIDENCE

Designated corridor	Daily traffic
College Avenue	25,200 to 44,400
Euclid Avenue	6,300 to 34,400
Home Avenue	17,300 to 32,400
University Avenue	11,000 to 29,100
El Cajon Boulevard	14,600 to 21,800
Fairmount Avenue	4,700 to 18,900
Adams Avenue	5,800 to 15,800
Federal Boulevard	5,400 to 9,400
Orange Avenue	2,400 to 6,800
Chollas Parkway	4,400

City's Draft Existing Conditions Mobility Assessment, Table 6.7 and Figure 5.3. Segment ranges within each corridor.

- Peak segment volumes on the designated corridors run from **4,400 vehicles a day on Chollas Parkway to 44,400 on College Avenue** under a single corridor designation. Fairmount Avenue varies fourfold along its own length; a corridor-wide designation cannot be right at both ends.
- **The draft's own Chapter 4 names the burden.** At printed pages 61 and 62 it says Mid-City communities "are closely situated to high-traffic corridors," that traffic-related pollutants "are known to worsen respiratory and cardiovascular health," and that "this pattern of freeway pollution likely helps explain higher asthma burdens." The analysis and the response both stop at the freeways: Policy 4.10 encourages air-pollution building features within 500 feet of a freeway (printed p. 78). The arterial corridors carrying the highest residential designations get no exposure analysis, no comparable standard, and no health risk assessment.

A PROPORTIONATE RESPONSE

The City's own data show enough variation among corridors to warrant a differentiated response, with no exposure level or health risk category asserted here, following the California Air Resources Board's 2017 advisory: **concentrate the highest designations at nodes** on College, Euclid, Home and University and step intensity back from the roadway edge; **differentiate by segment** on El Cajon, Fairmount, Adams and 54th; **use the roadway edge for active commercial frontage**; and **require filtration and protected air intakes** for homes in near-roadway zones. On Chollas Parkway, Orange, Federal and College Grove Drive, roadway exposure is not the governing consideration, and this comment says so.

IN THE DRAFT PLAN

Sustainability, Equity, Resilience and Conservation. "Air Pollution" and "Noise," printed pp. 61 to 62. **Land Use and Economic Prosperity**, Figure 2-1, printed p. 13 and pp. 16 to 25. Draft Ideas Report, August 2025, land use concept notes.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, sections 1, 5, 7 and recommendations 1, 2, 4, 5, 6; Fair Housing Review Chapter 6 and request 8.8.

Concentrate the highest designations where transit demand is measured to be strongest, and re-justify the Marketplace at the Grove and Federal at Euclid villages on the basis the data support.

Two of the plan's transit villages sit where transit demand is weakest and traffic heaviest. Marketplace at the Grove records 429 daily boardings and alightings against 44,400 vehicles a day, the lowest ratio in Mid-City. Fairmount at University, the busiest transit location in the plan area at 3,458 on 15,900 vehicles, is designated corridor.

EVIDENCE: THE CITY'S OWN STOP COUNTS AGAINST ITS OWN TRAFFIC COUNTS

Location	Daily boardings and alightings	Daily traffic	Per 1,000 vehicles	Proposed role
Fairmount Ave and University Ave	3,458	15,900	217.5	Corridor, beside Mid-City Center
43rd St and El Cajon Blvd	1,653	19,500	84.8	Transit village, Mid-City Center
54th St and El Cajon Blvd	1,266	15,400	82.2	Transit corridor
College Ave and University Ave	1,425	25,200	56.5	Transit corridor
Euclid Ave and Federal Blvd	366	29,400	12.4	Transit village
College Ave and College Grove Dr	429	44,400	9.7	Transit village

Mobility Assessment Table 4.1 (273 stops, combined by intersection across routes and directions) and Table 6.7. The ratio across thirteen major locations spans twenty-two fold. The Assessment's own list of five "highest ridership" locations does not match its Table 4.1; this ranking is built from the table.

- **Mid-City Center, which the plan calls a community village, is sited correctly, and this comment says so plainly.** The plan places it along Fairmount Avenue, El Cajon Boulevard and University Avenue (printed p. 88), which takes in the two busiest transit locations in the plan area, Fairmount at University and 43rd at El Cajon; together they carry 5,111 daily boardings and alightings, nineteen percent of all transit activity in the study area.
- Marketplace at the Grove and Federal at Euclid are large sites in consolidated ownership, and planning a village at either for its redevelopment potential is sound planning. **The label is what the data do not support, and the label determines the design.** A village justified by transit belongs at its densest close to the street. A village justified by site availability on a roadway carrying 44,400 vehicles a day is the strongest candidate in Mid-City for setting homes back from the roadway edge (Finding 11).
- **On planned service.** The draft justifies the College Grove village by "high-quality transit, including the planned Rapid 256," and the Federal and Euclid village by bus rapid transit and "the potential for a future transit station as part of the planned Trolley Purple Line" (printed p. 89). It states no timing or funding for either, and the Mobility chapter says only that the Purple Line "is planned ... with two stations in Mid-City" (printed p. 123). The 429 and 366 figures are present-conditions measurements; the plan should say when, and on what funding, the service it relies on arrives.

IN THE DRAFT PLAN

Urban Design. Figure 5-5, Marketplace at the Grove Study Area, printed p. 93, and its text at p. 89; Figure 5-6, Federal Boulevard and Euclid Avenue Study Area, printed p. 94. **Mobility,** Figure 6-3, Planned Transit Network, printed p. 124.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, sections 3c and 4 and recommendation 3; Mobility Assessment Tables 4.1 and 6.7.

Reconcile Figure 2-1 with Figure 5-1, or restate the Transit Neighborhoods definition to match the designations actually applied. The land use map does not deliver the graduated pattern the urban design framework describes.

The Urban Design Framework defines Transit Neighborhoods as "a mix of neighborhood-friendly housing types and markets that provide a transition from transit villages, corridors, and main streets" (printed p. 82), and Figure 5-1's own legend calls them "lower-scale buildings and missing-middle housing types" (printed p. 83). Much of the ground Figure 5-1 labels that way carries Residential Medium-3 and Medium-4 on Figure 2-1, at 56 to 109 homes per acre, applied across whole blocks. A uniform field at those densities is a transition from nothing to nothing.

EVIDENCE

The draft's own text at printed page 14 says the land use map "establishes a graduated pattern of development, transitioning from higher densities along urban and community villages and transit corridors to medium and lower densities within the surrounding neighborhoods." Figure 5-1, the Urban Design Framework, sets out the node-and-transition structure that sentence describes: Transit Villages concentrating the highest density around transit, Transit Corridors along main transit routes, Transit Neighborhoods stepping down behind them. Figure 2-1, Planned Land Uses, departs from it in three respects.

- **The highest designation is applied linearly, not at nodes.** Community Commercial at up to 218 homes per acre runs as a near-continuous ribbon along the full length of El Cajon Boulevard and University Avenue, while Figure 5-1 identifies a small number of villages.
- **Intensity does not decline with distance from the roadway.** Across Normal Heights south of Adams Avenue and through western City Heights, Medium-3 (56 to 73) and Medium-4 (74 to 109) are applied across whole blocks in a substantially uniform field. A parcel three blocks from El Cajon Boulevard carries broadly what a parcel facing it carries.
- **The two figures describe the same ground differently.** Much of that Medium-3 and Medium-4 area falls inside what Figure 5-1 labels Transit Neighborhoods.

THE TRANSITION FAILS IN TWO DIFFERENT WAYS IN THE TWO HALVES OF THE PLAN AREA

In western Mid-City the transition is absent because the medium-density field is continuous, several streets deep between El Cajon Boulevard and University Avenue. In eastern Mid-City it is absent because there is nothing between the corridor and the single-family blocks: along University Avenue near College Avenue and 60th Street, Community Commercial at up to 109 homes per acre abuts Residential Low-2 at 5 to 9 directly, with no intermediate designation. The same missing gradient produces uniform intensity in one half and an abrupt edge in the other. Neither is the transition Figure 5-1 describes.

These observations describe pattern, not parcels, and are taken from the published figures and the City's interactive land use map at the resolution released. This is not an argument against the densities; it is an argument that the plan's two figures should agree about where they go, and that the depth gradient in Finding 11 is the mechanism that would make them agree.

IN THE DRAFT PLAN

Urban Design. Figure 5-1, Urban Design Framework, printed p. 83, and the framework definitions at p. 82. **Land Use and Economic Prosperity,** Figure 2-1, Planned Land Uses, printed p. 13, with the designations at pp. 16 to 25, and "Transitions," printed p. 14.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, section 6 and recommendation 7.

Address the corridor conditions alongside the intensity decision. Mid-City recorded 316 pedestrian injury collisions in five years, concentrated on the corridors receiving the most new capacity, which also carry no low-stress bicycle route and the plan area's worst peak-hour intersections.

The City's Mobility Assessment records 316 pedestrian-involved injury collisions between 2018 and 2022, 16 of them fatal, concentrated on El Cajon Boulevard, University Avenue and Fairmount Avenue. Four of the fatalities were at El Cajon intersections and four at University intersections. These are the corridors where Figure 2-1 places its highest residential designations.

EVIDENCE

Intersection	AM peak delay	AM	PM peak delay	PM	Automobile collisions 2018-22
College Ave and University Ave	96.2 sec	F	142.7 sec	F	not top eight
Home Ave and Fairmount Ave	112.4 sec	F	76.6 sec	E	18
Euclid Ave and University Ave	56.6 sec	E	56.4 sec	E	not top eight
Fairmount Ave and El Cajon Blvd	56.0 sec	E	31.4 sec	C	29, highest in Mid-City
Fairmount Ave and Aldine Dr	13.2 sec	B	118.7 sec	F	
54th St and University Ave	24.7 sec	C	31.8 sec	C	16
Fairmount Ave and University Ave	42.1 sec	D	40.7 sec	D	15

Mobility Assessment Tables 6.9, 6.3 and 4.1. Twelve study intersections operate at level of service E or F in a peak; six are freeway ramps on I-805 and I-15. Level of service is reported here as a livability and transit-reliability measure; it is not the basis for the exposure findings, which rest on daily volume.

- **College Avenue at University Avenue fails in both peaks** and lies on a corridor the plan treats as suitable for its highest intensities. Fairmount at University, the busiest transit location in Mid-City, does not appear among the substandard intersections: the place with the strongest transit demand is not the place with the worst congestion.
- **El Cajon Boulevard at Fairmount is the most frequent automobile collision location in Mid-City** at 29, on a comparatively modest 9,400 vehicles a day, which points to a design condition rather than a volume condition.
- The Assessment finds every major corridor in Mid-City at bicycle level of traffic stress 3 or 4 in its entirety, University Avenue primarily 4, and **no low-stress route spanning the community in either direction**. Transit runs in the same lanes as general traffic on the corridors with the highest passenger activity.
- **The City's own Mobility Board made an overlapping case independently** in its comment letter of 19 August 2026: safety as the top priority of a detailed implementation program, a ranked project list, and infrastructure investment tied to planned growth. This comment aligns with that letter and adds the placement question in Findings 11 and 12.

IN THE DRAFT PLAN

Mobility. Figure 6-1, Planned Pedestrian Network, printed p. 120; Figure 6-2, Planned Bicycle Network, printed p. 122; Figure 6-4, Recommended Street Classifications, printed p. 127.
Implementation, Chapter 8.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, sections 2, 3, 3b and 3c, recommendation 8; City of San Diego Mobility Board letter, 19 August 2026.

Publish engagement participation by community planning area, and return before the second draft to the communities the process did not reach, at times and in languages that work for people with long or irregular hours.

The draft reports that "more than 3,000 people (as of June 2026) provided over 10,000 comments through 108 events and 2 online surveys." That is a meaningful level of participation and this comment says so. None of it is published by community, so whether all four communities were proportionately represented cannot be determined from the record.

EVIDENCE

The Introduction lists the engagement by format: 5 community forums, 7 workshops, 7 Working Group meetings, 11 office hours, 11 community interviews, 17 community planning group meetings, 17 pop-up stations, 27 youth engagement sessions and 6 focus groups, the last marked upcoming. It does not list it by place. For a plan that treats four communities as one Mid-City, that omission matters, because the four are not equally able to show up.

15.7% City Heights crowding rate, against 5.8 percent citywide; the highest in the plan area	74th City Heights CalEnviroScreen percentile statewide; the plan area's highest environmental burden	0 of 7 Eastern Area tracts with a State change designation, while its composition shifted 26 and 42 percent	-76.6% Normal Heights Black non-Hispanic population since 2000, on all four tracts designated
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- **Low participation from City Heights would not indicate low stake.** It is the plan area's most crowded community, carries its highest environmental burden, and its residents are the least able to give a weekday evening to a document about the next thirty years. A process that reads quiet as agreement will systematically underweight the community with the most at risk.
- Normal Heights and Eastern Area both carry conditions that raise the stakes of being heard: Normal Heights for its Black population decline and complete designation coverage, Eastern Area for a compositional shift the State's instruments do not register (Finding 7).
- If the engagement record cannot establish proportionate representation, the second-draft process should include targeted outreach to each of the four planning groups, scheduled outside weekday evenings, located inside each community, and translated.

ANSWER COMMUNITY BY COMMUNITY

The draft's fair housing and anti-displacement content speaks of Mid-City as one place. This comment asks that the City's response to it, and the second draft's own fair housing analysis, state which of the conditions documented here it accounts for and which it does not, in four separate answers rather than a single plan-area narrative. The four communities share a boundary. They do not share a story.

IN THE DRAFT PLAN

Introduction. "Community Engagement," printed pp. 10 to 11.
Implementation, Chapter 8, for the second-draft process.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, Chapter 7 and requests 8.9 and 8.10; Chapter 9, question 6.