

Mid-City Communities Fair Housing Review

Fair housing conditions and the first draft plan update

Prepared by San Diego Fair Housing Lab

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Mid-City Communities Plan Update, September 2026

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0. Front Matter

About this document. This review is Part I of a two-part work. Part II, the supporting technical documentation, carries the detailed data record, methodology, the City's fair housing record, community profiles and sourcing. **Chapter references above 10 point to Part II**, which the San Diego Fair Housing Lab will publish on its website. Every figure in this review is either reproduced from one of the Lab's four community reports or verified directly against tract-level Census and State data.

What this document is. A tract-level fair housing review of the first draft Mid-City Communities Plan Update, covering all four communities inside the plan boundary: Mid-City City Heights, Mid-City Eastern Area, Mid-City Kensington-Talmadge and Mid-City Normal Heights. It combines this organization's analytical record with its formal public comment, which was previously a separate document and is now consolidated here.

Companion analysis. A separate corridor analysis examines traffic exposure, transit demand and residential intensity across the corridors the plan designates. It is kept separate so the transportation argument does not eclipse the fair housing one. Chapter 6 summarises its findings and its asks.

Sources. U.S. Census Bureau data, California HCD's 2026 Opportunity Map and Neighborhood Change methodology, HCD Annual Progress Report housing production data, CalEnviroScreen 5.0, and the City of San Diego's own plan documents and Housing Element Fair Housing Appendix. Plan figures and quotations are the City's own. Full sourcing in Chapter 19.

The four community reports function as this document's appendices, and carry the full per-tract record behind every aggregate cited here:

- **Appendix 1** – City Heights community report, 15 tracts.
- **Appendix 2** – Eastern Area community report, 7 tracts, including the central detection-gap finding.
- **Appendix 3** – Kensington-Talmadge community report, 4 tracts, including the plan area's only Persistent RCAA tract.
- **Appendix 4** – Normal Heights community report, 4 tracts, including its Black non-Hispanic population decline and its complete pathway designation coverage.

A note on terms. Where this document says **neighborhood change area**, it means a tract carrying one of California HCD's Neighborhood Change pathway designations: the State's own marker for a historically lower-income community of color that has since seen substantial racial and economic change. Where it says **lowest opportunity tier**, it means Low Resource on HCD and TCAC's 2026 Opportunity Map. Both are the State's classifications, not this organization's.

A note on housing figures. **Capacity** is what a plan's land use map would allow to be built. **Permitted** units have been authorised. **Completed** units exist. This document reports production as permitted or as completed, never as a rate computed between them, and it does not treat capacity as a forecast of production. Three of the four communities here added units while losing population, and the plan area permits at roughly half the citywide rate, seven in ten of those permits being accessory units. **Where this review asks the City to publish capacity by community, it is asking what the plan assumes, not what the market will deliver.**

1. The Mid-City Plan Update: Where Things Stand

1.1 A plan adopted before the law that now governs it

The Mid-City Communities Plan currently in effect was adopted **4 August 1998**, covering all four communities examined here. AB 686 (2018, effective 2019), the Baker Settlement (March 2025), and HCD’s Neighborhood Change and Opportunity Map methodologies (2026) all postdate it by between 21 and 28 years.

The plan being replaced was adopted before California law required any of the analysis in this review. That is the opportunity this update represents, and it is why the fair housing content of the first draft matters more here than in an ordinary plan amendment.

1.2 This update is unlike the twelve that came before it

Since 2016 the City has comprehensively updated twelve community plans: Greater Golden Hill, North Park, San Ysidro and Uptown in 2016; Midway-Pacific Highway in 2018; Mission Valley in 2019; Kearny Mesa in 2020; Barrio Logan in 2021; Mira Mesa in 2022; University in 2024; and Clairemont Mesa and College Area in 2025.

Measured on the two instruments the State itself uses, Mid-City is close to the inverse of that entire set.

TABLE 1.1 – MID-CITY AGAINST EVERY COMMUNITY PLAN COMPREHENSIVELY UPDATED SINCE 2016

	Tracts	Highest or High Resource	Lowest opportunity tier	Neighborhood change areas
Twelve communities updated 2016 to 2025	96	63	14	14 (14.6%)
City of San Diego	311	170	95	44 (14.1%)
Mid-City, this draft	30	1	23	9 (30.0%)

Verified by direct query against the State’s 2026 Opportunity Map and Neighborhood Change classifications, joined to 2020-vintage census tract geography across all 311 in-city tracts.

Mid-City’s neighborhood change rate is roughly double both the citywide rate and the combined rate of every community the City has comprehensively updated in the last decade. Nine of those twelve communities contain no neighborhood change area at all. The four most recent updates before this one, covering **51 census tracts** in Mira Mesa, University, Clairemont Mesa and College Area, contain **zero**.

The fair housing component of this plan therefore carries weight that recent precedents did not. A fair housing analysis that was arguably a formality in Mira Mesa is the substance of the matter here.

1.3 The land-use alternative carried into the first draft

This review does not evaluate the plan’s land use alternatives. That assessment requires reading the City’s own alternatives documentation directly, which is outside the scope of this review as published. The companion corridor analysis examines the residential intensity pattern the selected alternative produces, and Chapter 6 summarises it.

1.4 What the plan says it is trying to accomplish

The City has described the update publicly as creating capacity for on the order of **30,000 new homes over 30 years**.

That figure is the City's, and this review does not adopt it as a premise. The draft does not publish residential capacity by community planning area, which means the 30,000 cannot be tested against the distribution question this review asks. **The absence is the point, and it is the subject of the ask at 8.2.** Where alternative capacity figures appear in the City's own materials, this review cites them as alternatives rather than resolving between them.

The draft itself carries a plan-area figure. Table 2-1, Development Potential, at printed page 15 (captioned Table 2-2 on the page; the draft's own numbering is inconsistent), puts residential development potential at **53,500 homes in 2025, a possible net future change of 42,000, and a horizon total of 95,500**, with population rising from 138,000 to 227,000. The City's project page and press coverage describe the update as capacity for about 30,000 homes. Both are City figures; no City document reconciles them, and the likely relationship, net new homes above the existing stock against total buildout, is not stated anywhere this review has found. **The draft therefore publishes a plan-area total and no split among the four communities.** Anyone quoting a Mid-City capacity figure should say which one and cite its page.

The draft also invokes the City's duty to affirmatively further fair housing, states that it will reverse patterns of segregation and reduce concentrations of poverty, and in **Policy 2.8** encourages the equitable distribution of affordable housing.

1.5 The fair housing question this review tests

Not whether the plan builds enough housing, and not whether it builds too much. This review asks a narrower and more answerable question:

Does the plan test where its housing capacity, its affordability requirements and its environmental burden land, against the fair housing geography the City has already adopted?

That question can be answered from the document itself, and the answer is developed in Chapter 4.

2. What the Data Shows: Four Communities, Three Distinct Stories

2.1 Four communities, one planning boundary

The four Mid-City communities share a boundary and not a fair housing story. Population change alone runs from Eastern Area's +15.4 percent to City Heights' -8.0 percent, opposite directions inside a single plan boundary.

TABLE 2.1 – MASTER COMPARISON

	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	District 9	City of San Diego
Tracts	15	7	4	4	33	311
Population change	-8.0%	+15.4%	+2.9%	-4.4%	-1.7%	+14.1%
Unit growth	+6.3%	+9.9%	+11.3%	+7.0%	+8.0%	+21.7%
Growth gap (units - pop, pp)	+14.3	-5.5	+8.4	+11.4	+9.7	+7.7
Current crowding rate	15.7%	7.7%	2.3%	2.8%	10.0%	5.8%
Rent change vs. 64.5% threshold	73.7% (ABOVE)	61.8% (below)	65.2% (ABOVE)	83.1% (ABOVE)	70.1% (ABOVE)	64.8% (ABOVE)
Opportunity tier composition	15 Low	7 Low	3 Moderate / 1 Low	1 High / 3 Moderate	1 Highest / 1 High / 7 Moderate / 24 Low	117 Highest / 53 High / 45 Moderate / 95 Low / 1 unclassified
Mean opportunity score (0-9)	1	1	3	5	2	5
Neighborhood change rate	26.7% (4 of 15)	0.0% (0 of 7)	25.0% (1 of 4)	100.0% (4 of 4)	36.4% (12 of 33)	14.1% (44 of 311)
RCAA-concentrated tracts	0	0	1	0	1	26
CES 5.0 overall percentile	74.0	62.8	32.0	18.1	58.3	37.1

Every cell is traced to the community report's own sections. The RCAA row counts RCAA-concentrated tracts only; see 2.4 and Chapter 13. Growth gaps are computed from unrounded growth rates and can differ by 0.1 point from the difference of the two printed rates.

TABLE 2.2 – AGE COMPOSITION, 2000 TO CURRENT

	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	District 9	City of San Diego
Under-18 share	36.6% → 23.0%	25.6% → 21.8%	20.2% → 15.3%	22.2% → 10.4%	30.0% → 19.7%	24.4% → 18.8%
Under-18 change (pp)	-13.6	-3.8	-4.9	-11.8	-10.3	-5.6
Under-18 change (count)	-12,878	-128	-613	-1,731	–	-35,591
65+ share	5.3% → 10.6%	11.6% → 12.7%	11.0% → 15.1%	6.9% → 10.2%	7.2% → 10.6%	10.6% → 14.9%
65+ change (pp)	+5.2	+1.2	+4.1	+3.3	+3.4	+4.3

Share figures from each community report's own Section 7. Count figures are from direct query of Census age-bracket counts; they reconcile to the share figures through each community's population change. Point changes are computed from unrounded shares and can differ by 0.1 from the difference of the two printed shares.

2.2 City Heights: population loss, crowding and environmental burden

Verified figures. 15 tracts. Population **-8.0 percent** (83,084 to 76,398) against District 9's -1.7 percent and a citywide +14.1 percent. Current crowding **15.7 percent**, the highest of the four and more than double the citywide 5.8. CES 5.0 percentile **74.0**, the highest of the four. Neighborhood change rate **26.7 percent (4 of 15)**, below District 9's own 36.4 percent. **All 15 tracts in the lowest opportunity tier.** Zero RCAA-concentrated tracts.

City Heights holds roughly half the plan area's population and its largest concentration of need. Its crowding rate is the figure that most distinguishes it: more than double the citywide rate, alongside continued population loss and the plan area's highest environmental burden. **It lost 12,878 children since 2000, 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. Those two figures reconcile through household size and, to a smaller degree, through vacancy. **Occupied units rose 4.1 percent** over the same period, from about 24,600 to about 25,600, while **average household size fell from 3.363 to 2.957**, a decline of 12.1 percent. The vacancy rate rose from 3.7 to 5.6 percent, and holding the 2000 occupancy rate against the current stock puts about 530 units behind that rise, **just under a quarter of the population decline.** Household size carries the rest.

City Heights gained households and lost people. What that does not establish is why household size fell. Smaller households forming, larger households leaving, and turnover replacing larger households with smaller ones all produce this pattern, and the data here do not separate them.

What this data does not establish is why the State's own instrument flags this community less often than the district around it. Chapter 12 returns to that directly.

2.3 Eastern Area: growth accompanied by compositional change the State does not detect

Verified figures. 7 tracts. Population **+15.4 percent** (32,092 to 37,049), close to the citywide rate, and the only Mid-City community where population growth outpaced housing growth. White non-Hispanic population **-26.0 percent** (12,562 to 9,292); population of color **+42.1 percent** (19,530 to 27,757), both

reproduced from the tract counts at three geographic scales. **Zero of 7 tracts carry any neighborhood change designation.** All 7 tracts in the lowest opportunity tier.

Growth is not the same as stability. Eastern Area grew while its composition changed substantially, and the State's own instrument registers none of it. This community crosses one of HCD's three rate-of-change thresholds, the fewest of the four.

For a plan update that will shape this community's trajectory over 30 years, the absence of State designations in Eastern Area should not be read as an absence of fair housing relevant change. This is the clearest case in the plan area for the ask at 8.4.

This data documents the compositional shift and its absence from the detection instrument with precision. It does not establish why the shift occurred or why the methodology does not register it, and neither is claimed here.

2.4 Kensington-Talmadge: concentrated affluence, and an average that describes nobody

Verified figures. 4 tracts, entirely within District 9. Population **+2.9 percent** (14,460 to 14,883), the only Mid-City community growing while District 9 declined. Current median home value **\$1,125,844**, the highest of the four and about **\$254,500 above the citywide median of tract medians (\$871,300).**

Three Moderate Resource tracts and one Low Resource tract; no High Resource tract. Mean opportunity score 3. Neighborhood change rate 25.0 percent (1 of 4). Current crowding 2.3 percent, the lowest of the four.

One tract, tract 20.01, is classified Persistent RCAA, independently confirmed by this organization's own classification and separately named by the City's own Fair Housing Appendix (Chapter 13). It is District 9's only RCAA-concentrated tract.

Two points on which this community is often misdescribed, including in this organization's own earlier materials:

Kensington-Talmadge does not hold the plan area's only higher-opportunity tracts. It holds no High Resource tract at all. **The plan area's single High Resource tract is tract 19, in Normal Heights.** Kensington-Talmadge's distinction is affluence concentration and home value, not opportunity tier.

Its household income is not exceptional. At about 4.3 percent above the citywide figure, arguments that this community is unusually wealthy on income do not hold at the community level.

What does hold is that the community-level figure describes nobody in it. Two of its four tracts sit at roughly \$182,000 with about a quarter renters; the other two sit at roughly \$79,000 with over eighty percent renters. **The dividing line runs through the middle of the community, not around it,** and a plan-area average sits well above the income of the majority of its own residents. Chapter 16 carries the tract detail.

This data documents Kensington-Talmadge's structural position in the plan area's opportunity distribution. It does not establish whether or how that position has affected who can access housing within it, which is the question the ask at 8.1 puts to the City.

2.5 Normal Heights: the plan area's highest opportunity, and its steepest racial loss

Verified figures. 4 tracts, entirely within District 9. Population **-4.4 percent** (14,126 to 13,510). Black non-Hispanic population **-76.6 percent** (1,827 to 427). **All 4 of 4 tracts carry a neighborhood change designation**, two of them carrying all three pathway types at once, the only Mid-City community where every tract is designated. Rent growth **83.1 percent**, the widest margin above the State's threshold in the plan area. **One High Resource tract and three Moderate; no Low Resource tract.** Mean opportunity score 5, matching the citywide average. Zero RCAA-concentrated tracts.

Normal Heights holds the plan area's only High Resource tract, and it has lost more than three quarters of its Black residents and more than half its children. **Its Black population decline is the steepest 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 percent.

Fewer than one household in twelve has been there since 2000, the least stable tenure profile in the plan area.

These two facts sit together and the plan has to hold both. This is the plan area's higher-opportunity community and the one losing its Black residents fastest. That combination is a fair housing concern in its own right, distinct from the displacement pressure in City Heights.

This data establishes that the population decline and the designation pattern describe the same geography in the same period. It does not establish that the State's designations are responding to the Black population decline specifically, and no such link is claimed here.

2.6 What the four communities show together

Read side by side, the four profiles resolve into findings no single community's figures show alone.

1. The plan boundary contains both ends of the city's opportunity distribution, and the higher end is split between two very different communities. City Heights and Eastern Area sit entirely in the lowest opportunity tier, 22 of 30 tracts between them. The plan area's Moderate and High Resource tracts are divided between Kensington-Talmadge, which holds the affluence concentration, and Normal Heights, which holds the single High Resource tract and is changing fastest. **Neither of those is the simple "one affluent community, three poor ones" shape**, and a plan that assumes it will address the wrong geography.

2. Mid-City is losing its children at nearly three times the citywide rate. The plan area lost **15,350 residents under 18 since 2000, a 34.3 percent decline against 12.3 percent citywide.** These 30 tracts are about 10 percent of the city's tracts and account for **43 percent of San Diego's entire loss of children.** Normal Heights lost 55 percent of its children and City Heights lost 12,878. **A community that cannot keep its families is not a community a 30-year plan can treat as stable.**

3. Three of four communities added housing while losing population. City Heights, Kensington-Talmadge and Normal Heights all show units outpacing population. Eastern Area is the exception in the opposite direction, with population outpacing units. **Building alone has not held these communities together**, which is a caution against reading capacity as a fair housing answer in itself.

4. Three of four cross the State's rent-pressure threshold, and the one that does not is the one growing fastest. City Heights 73.7 percent, Kensington-Talmadge 65.2, Normal Heights 83.1, all above the 64.5 percent regional marker; Eastern Area 61.8 percent, below it.

5. Environmental burden and displacement pressure do not align inside this plan boundary the way they do citywide. Normal Heights carries the plan area's lowest environmental burden alongside its highest rent pressure and its complete designation coverage. City Heights carries the highest environmental burden alongside a designation rate below its own district's. At cluster scale across the city these two measures co-locate; **inside this plan boundary, at community scale, they do not.** Both statements hold at their own resolution.

6. The age pattern is the young-families-leaving shape in the communities under pressure. City Heights and Normal Heights show the steepest under-18 declines and paired 65+ increases. Kensington-Talmadge shows a milder under-18 decline with the largest 65+ share at the current endpoint, 15.1 percent, an aging profile rather than a pressure-driven one.

3. The Fair Housing Geography of Mid-City

3.1 Mid-City in the citywide picture

City Heights lost 8.0 percent of its population while the city grew 14.1 percent, a reversal of direction that places it at the far end of a citywide pattern rather than outside it. None of the four communities matches the supply-meeting-demand shape seen in the Northern Suburbs, where population and units grew nearly in lockstep. None matches the coastal-constraint shape of the Western Supply-Constrained cluster either.

TABLE 3.1 – MID-CITY AGAINST THE CITYWIDE SUPPLY AND POPULATION PATTERN

Geography	Population change	Unit growth	Growth gap (units - pop, pp)
Mid-City: City Heights	-8.0%	+6.3%	+14.3
Mid-City: Eastern Area	+15.4%	+9.9%	-5.5
Mid-City: Kensington-Talmadge	+2.9%	+11.3%	+8.4
Mid-City: Normal Heights	-4.4%	+7.0%	+11.4
District 9	-1.7%	+8.0%	+9.7
City of San Diego	+14.1%	+21.7%	+7.7
Northern Suburbs (supply meeting demand)	+43.0%	+45.9%	+2.9
Western Supply-Constrained (coastal constraint)	+7.3%	+3.6%	-3.6

Growth gaps are computed from unrounded growth rates and can differ by 0.1 point from the difference of the two printed rates.

Read against our eleven-cluster comparison of supply and demand across the city, Mid-City's growth gap is not a local anomaly. It is one instance of a citywide structure in which supply concentrates at the periphery and in redevelopment cores rather than in already-built, already-populated communities under population or rent pressure.

Whether Mid-City's growth gap reflects supply constraint specific to these four communities, broader citywide land use and zoning conditions, or some combination, is not established by a population and unit comparison alone.

3.2 Two clusters, one plan boundary

This plan boundary splits across two of this organization's regional clusters, and the two are not two versions of the same story. City Heights and Eastern Area sit inside **Southeast Communities**; Kensington-Talmadge and Normal Heights sit inside the **El Cajon Boulevard Corridor**. Southeast Communities lost population and carries an environmental burden percentile nearly double the citywide figure; the El Cajon Boulevard Corridor grew, and its environmental burden sits below the citywide figure. Full comparison in Chapter 14.

The Mid-City slice of each cluster does not track its parent. City Heights lost population more than four times faster than Southeast Communities as a whole, while Eastern Area grew 15.4 percent as that same cluster shrank 1.9 percent. Kensington-Talmadge and Normal Heights both sit below their own cluster's growth, in opposite directions from each other.

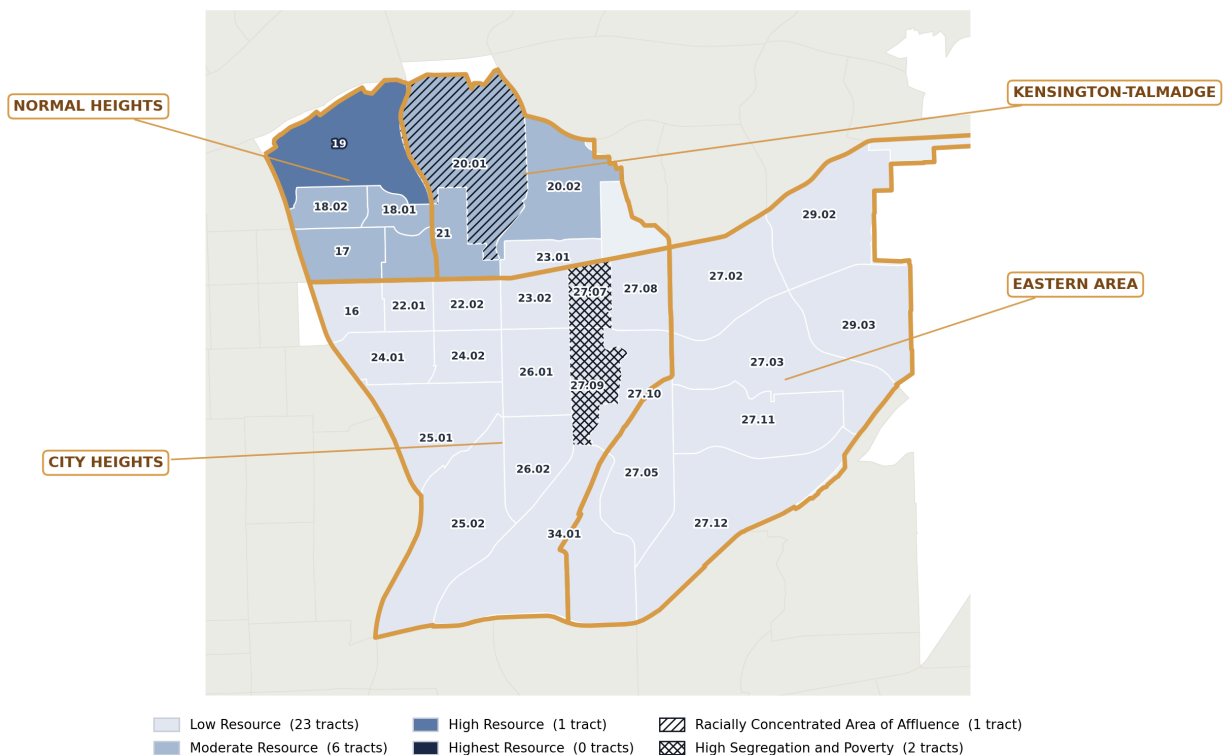
What this comparison cannot establish is why a single plan boundary spans two clusters this organization's regional analysis already treats as analytically distinct.

3.3 The opportunity map

Twenty-three of the plan area's thirty tracts sit in the lowest opportunity tier. One sits in High Resource. Six sit in Moderate. **Against a city that holds 170 High or Highest Resource tracts out of 311, this plan boundary holds one.**

Mid-City Communities: opportunity tier by census tract

Thirty tracts inside the plan boundary. Numbers are census tract identifiers; heavy outlines are community planning area boundaries.



No tract inside the plan boundary is Highest Resource. | Source: California HCD and TCAC 2026 Opportunity Map; 2020 Census tract boundaries clipped to the plan area; City of San Diego community plan boundaries.

The thirty tracts of the Mid-City plan boundary by State opportunity tier, with community planning area boundaries and tract numbers for reference. Hatching marks the one Racially Concentrated Area of Affluence and the two High Segregation and Poverty tracts.

That distribution is the fair housing context for every capacity and affordability decision in the draft. It is also the reason the ask at 8.6 exists: a plan confined to this boundary cannot, by itself, deliver opportunity access to the residents inside it.

3.4 The opportunity gap within the plan boundary

The opportunity map describes what tier each tract sits in. It does not describe what sits next to it, and for a resident that distinction is the one that governs daily life.

Twenty-one of the plan area's thirty tracts have no High or Highest Resource neighborhood on any of their borders. For eleven of them, every single neighboring tract sits in the lowest opportunity tier.

TABLE 3.2 – HIGHER-OPPORTUNITY NEIGHBOURS, BY COMMUNITY

	Tracts	No High or Highest neighbour	Every neighbour 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	30	21	11

Computed from a tract adjacency table built on 2020 Census tract geometry in the California Albers projection. Shared-boundary threshold 30 metres; the result is insensitive to that choice below 100 metres.

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.

This is a measurement, not an inference. It carries no counterfactual, no model and no margin of error. **For a review testing whether a plan addresses access to opportunity, it is the most direct measure available,** and citywide it describes 84 tracts and about 387,000 residents.

3.5 What Mid-City can and cannot accomplish

A plan confined to this boundary cannot deliver opportunity access on its own. Twenty-nine of thirty tracts here are Low or Moderate Resource. Meaningful access to higher-opportunity neighborhoods for Mid-City residents depends on capacity created in communities outside this plan, and the plan should say so rather than leave the implication that it can solve the problem within its own lines.

What this plan can do inside its boundary is determine where its own capacity and affordability requirements land, whether its one higher-opportunity community absorbs any of the affordable housing obligation, and whether the communities carrying the burden today carry more of it tomorrow. Those are the subjects of Chapter 5.

4. What the Plan Commits To, and Where the Evidence Falls Short

4.1 What the plan actually commits to

The draft's anti-displacement and affordable housing policies are more specific than most community plans provide. The numbered policies at 2.9 through 2.18, under those two headings in Chapter 2, Land Use and Economic Prosperity, at printed pages 34 and 35, name tools rather than gesturing at intent: relocation assistance, extended tenant notice and options to return to new affordable homes to the maximum extent feasible, community land trust support, and affordable homeownership. **Policy 2.8** reads in full: "Encourage the equitable distribution of affordable housing throughout Mid-City to expand access to opportunity, avoid the concentration of affordable housing in any single neighborhood, and support mixed-income communities that promote neighborhood stability, inclusivity, and quality of life." **Policy 2.15** supports onsite very-low and low-income homes "rather than paying in-lieu fees, to the maximum extent feasible." **This is a real policy set and this review does not dispute it.**

What those policies do not establish is any way to determine whether they are working. No baseline is published, no target is stated, and no reporting mechanism is named. A commitment that cannot be evaluated cannot be enforced, by the public or by the City.

One caution about how this section should be read. The claim here is narrow and deliberately so: the policies are more specific than the norm, and they are unmeasurable. This review does not assert that the plan's fair housing strategy is adequate, because the document does not contain the analysis that would let anyone judge that. See 4.2.

4.2 The spatial fair housing test is missing

The draft invokes the duty to affirmatively further fair housing in its own words. The corresponding spatial analysis is not in the document.

The draft states that the City will affirmatively further fair housing, reverse patterns of segregation and reduce concentrations of poverty. It contains no analysis showing where its capacity lands against the opportunity map, no distribution of affordable capacity by community, and no test of the land use map against the geography of need.

That geography already exists in the City's own adopted data. The Opportunity Map, the Neighborhood Change designations, the Housing Element Fair Housing Appendix's own RCAA and RECAP designations, and the Baker Settlement's own tier-based commitment are all City or State instruments the plan could have measured itself against. None of them appears as a test in the draft.

This is the review's central finding and it is checkable by anyone in ten minutes. It does not depend on any figure this organization produced.

4.3 The fair housing rationale needs to be made explicit

Where the land use map does advance fair housing, the plan should say how, in the plan itself rather than in an appendix or by reference. A rationale that a resident cannot find and check is not a rationale the public can hold the City to.

4.4 The need for measurable outcomes

Policy 2.8 encourages equitable distribution, and the plan publishes no figure against which that policy can be tested. The plan does not publish residential capacity by community planning area, does not state existing affordable stock by community, and does not report current-cycle production by community. **All three are available to the City.** Two of them are reproduced in this document.

5. Four Fair Housing Tests for the Draft Plan

Each test below follows from a documented finding, and each can be answered from data the City already holds.

5.1 Housing growth without accelerated displacement

Higher-density development is proposed along corridors running through or directly adjacent to City Heights and Normal Heights, the two communities this review's data identifies as carrying the most severe displacement pressure. Both show population loss alongside rent growth above the State's own threshold; Normal Heights carries a designation on all four of its tracts.

Adding housing in communities already losing population to affordability pressure can be beneficial when it is paired with meaningful anti-displacement protection. Without that pairing, new development in these corridors risks accelerating the loss this review documents.

The test: for each priority corridor, what anti-displacement tools apply, and what share of new units will be affordable at what income levels?

5.2 Identifying fair housing risk beyond the State's designations

Two of the four communities show documented conditions the State's Neighborhood Change system does not register.

City Heights' designation rate, 26.7 percent, sits below District 9's own 36.4 percent, despite the plan area's highest crowding, steepest population loss, highest environmental burden and rent growth well above the State's threshold. **Eastern Area's rate is zero** despite a verified compositional shift of 26.0 percent White non-Hispanic decline against 42.1 percent growth in its population of color.

A plan using State designations as its scoping tool would correctly prioritise Normal Heights, under-prioritise City Heights, and miss Eastern Area entirely.

The test: does the plan's anti-displacement analysis supplement State designations with population change, crowding, rent trajectory and racial composition, and is that supplement reflected in corridor-level implementation guidance?

5.3 Expanding access to higher-opportunity neighborhoods

State law under AB 686 requires that cities not only avoid concentrating affordable housing in lower-opportunity areas but affirmatively promote access to higher-opportunity ones.

Inside this plan boundary that obligation lands on two communities, not one. Kensington-Talmadge holds the affluence concentration, the highest home values and District 9's only Persistent RCAA tract. Normal Heights holds the plan area's only High Resource tract, and is simultaneously losing its Black residents faster than any community in the city. **Access and stability are both at issue, in different places.**

The test: 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?

5.4 Equitable distribution of affordable housing

Affordable housing in this plan area is being built where opportunity is lowest.

TABLE 5.1 – BELOW-MODERATE UNITS PERMITTED PER 1,000 EXISTING HOMES, CURRENT CYCLE

Below-moderate units permitted per 1,000 existing	
City of San Diego	11.8
Mid-City plan area	7.6
City Heights	12.3
Kensington-Talmadge	4.9
Normal Heights	2.6
Eastern Area	2.1

Below-moderate units permitted in the current RHNA cycle, from HCD Annual Progress Report Table A2, against existing housing units from the 2000-to-current stock series. Permitted, not completed.

City Heights, every one of whose fifteen tracts sits in the lowest opportunity tier, is the only one of the four producing affordable housing above the citywide rate. The three communities holding every Moderate and High Resource tract in the plan area produce at 18 to 42 percent of the citywide rate. City Heights holds 49 percent of the plan area’s housing stock, 63 percent of its existing deed-restricted units, and 80 percent of its current-cycle below-moderate production.

This is a distribution finding, and it holds regardless of who builds.

It is not a finding that City Heights has too much affordable housing. Meeting housing need where lower-income households already live and expanding access to higher-opportunity neighborhoods are both fair housing objectives, and they are complements rather than substitutes. Affordable housing in City Heights should be preserved and expanded. **The finding is that the plan area’s three higher-opportunity communities are producing almost none of it,** inside a single plan boundary, while the plan encourages equitable distribution and publishes no figure against which either objective can be measured.

Two figures that bear on how this is read. Mid-City permits **32.9 units per 1,000 existing units against 62.4 citywide,** roughly half the city’s rate, 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 accessory units, with **no units at all permitted in buildings of five or more.** Whatever is happening in Mid-City, large-scale development is not it.

The test: does the plan publish capacity and affordable capacity by community; does it read that distribution against **need, existing concentration, opportunity tier and development feasibility;** and does Policy 2.15’s onsite preference apply where it would change the result? **Publishing the table is the first half of the test. Explaining why the distribution it shows is equitable, against those four baselines, is the second.**

5.5 Naturally occurring affordable housing: the stock the plan says it will preserve

The draft names the preservation of “naturally occurring affordable housing” as an important component of accommodating growth, at printed page 15, and cites the Housing Element’s HE-H.1, “Monitor affordable rental units at risk of converting to market rents,” in Table 2-3 at printed page 32. It

publishes no Mid-City baseline against which either could be tracked. This section supplies one.

A rental counts as affordable here when its gross rent is at or below 30 percent of a stated share of HUD's median family income for San Diego County, divided by twelve. At 60 percent of median family income the threshold was \$805.50 a month in 2000 and is \$1,792.50 now; at 80 percent, \$1,074.00 and \$2,390.00. No subsidy status, building age or covenant enters the test: it is a rent test on the whole rental stock, which is what “naturally occurring” means. The denominator is renter-occupied homes paying cash rent. **Units, not households:** the Census reports what a home rents for, not who lives in it.

The two thresholds tell different stories, and a preservation target has to choose.

TABLE 5.2 – SHARE OF RENTALS AFFORDABLE AT 60 PERCENT OF MEDIAN FAMILY INCOME

	Tracts	2000 share	Current share	Change (points)	Floor (points)	Affordable homes, change
City Heights	15	89.64%	52.37%	-37.3	-20.9	-7,012
Eastern Area	7	61.11%	38.03%	-23.1	-10.6	-823
Kensington-Talmadge	4	76.23%	38.48%	-37.8	-24.1	-1,138
Normal Heights	4	85.24%	43.58%	-41.7	-21.1	-2,054
Mid-City plan area	30	83.01%	46.88%	-36.1	-20.2	-11,028
City of San Diego	311	55.00%	27.57%	-27.4	-18.2	-43,004

TABLE 5.3 – SHARE OF RENTALS AFFORDABLE AT 80 PERCENT OF MEDIAN FAMILY INCOME

	Tracts	2000 share	Current share	Change (points)	Floor (points)	Affordable homes, change
City Heights	15	97.49%	84.76%	-12.7	-7.6	-2,493
Eastern Area	7	87.91%	70.38%	-17.5	-8.2	4,437 to 4,184 (see note)
Kensington-Talmadge	4	90.43%	71.56%	-18.9	-11.5	-316
Normal Heights	4	96.11%	78.90%	-17.2	-12.0	-920
Mid-City plan area	30	95.00%	79.75%	-15.3	-9.1	-3,982
City of San Diego	311	77.12%	53.05%	-24.1	-15.3	-21,717

Census 2000 (SF3 table H062, harmonised to 2020 tract boundaries) against ACS 2020-2024 (table B25063). Where a threshold falls inside a published rent bracket, the units in that bracket are counted in proportion to where the threshold sits. **Change** is the current share minus the 2000 share as printed, in points; the shares carry two decimals so that it recomputes from the two operands beside it on every row. The **floor** is the change in share when every unit in the boundary bracket is counted as affordable now and none of them in 2000, so it is the figure that survives an adversarial reading. Community figures sum units across member tracts and then divide; no figure is an average of tract shares. Eastern Area at 80 percent: the point estimate is -253 homes and the worst-case treatment of the boundary bracket is +272, so the direction of change is not established and both years' counts are stated instead. Every other row holds its direction under either treatment.

Mid-City's rental stock grew by about 1,120 homes over the period. Its stock affordable at 80 percent of median family income is still 79.8 percent, well above the citywide 53.05. Its stock affordable at 60 percent fell from 83.0 to 46.9 percent, a loss of 11,028 homes. The plan area remains a broadly affordable place at 80 percent of median family income and has stopped being one at 60 percent. The loss sits in the deeper band. **A preservation target set at 80 percent would report most of this stock as intact,** which is the practical point for HE-H.1 and for Policy 2.13.

Mid-City lost more share 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 percent and had less room to fall in that band. At 60 percent, City Heights lost the most homes (7,012) and Normal Heights the most share; the two rankings differ, and a single ordering would mislead.

These are stock figures. They say how much of the rental stock rents below a threshold. They do not say where anyone went or why, and setting them beside the plan's growth figures describes two things happening at once rather than one causing the other. Deed-restricted homes renting below the threshold are inside these counts, not subtracted from them. The community is the reportable unit: at tract level the current-vintage rent brackets are \$500 wide above \$1,500 and both thresholds fall inside one, so tract shares carry bands too wide to publish, and the community reports carry counts in their place.

The test: does the plan publish a naturally-occurring-affordable baseline for each community at a stated income threshold, name the threshold, and report against it annually under HE-H.1?

6. Environmental Justice and Housing

This chapter summarises. Every figure here traces to the companion corridor analysis.

6.1 Uneven environmental burden

Environmental burden inside this plan boundary ranges more widely than any other measure in this review. City Heights sits at the **74.0** CalEnviroScreen percentile, in the top quarter of census tracts statewide; Normal Heights sits at **18.1**. Eastern Area is 62.8 and Kensington-Talmadge 32.0. The citywide figure is 37.1.

6.2 Where growth and environmental burden intersect

Peak segment volumes on the fourteen roadways the companion analysis examines range from 4,400 to 44,400 vehicles a day, a tenfold spread receiving a single corridor treatment. **Twelve intersections already operate at substandard levels during peak periods.** The two study areas the plan calls transit villages, Marketplace at the Grove and Federal Boulevard at Euclid Avenue, sit where measured transit demand is weakest. And **Mid-City's 316 pedestrian injury collisions concentrate on the corridors receiving the most new capacity.**

6.3 What the plan analyses and what it does not

The City committed to an air and noise assessment for this geography in its own August 2025 Ideas Report, stating that additional density between El Cajon Boulevard and University Avenue and along the SR-15 corridor would be studied while assessing air and noise pollution.

The density is in the first draft. The assessment is not.

The plan also names an environmental justice burden along the corridors without testing its own land use pattern against it.

6.4 The appropriate policy response

The corridor analysis is explicit about what it does not claim: **no quantified exposure level and no health risk category is asserted.** What it establishes is that traffic volume and distance from the roadway vary enormously across corridors receiving a uniform designation. The response that follows is proportionate rather than prohibitive: differentiate intensity by measured volume, site the highest designations where transit demand is measured to be strongest, establish a depth gradient behind the highest-volume segments, and require filtration and protected air intakes for residential buildings within identified near-roadway zones, consistent with the California Air Resources Board's 2017 technical advisory.

7. Engagement and Accountability

7.1 What the City reports

By the draft's own count at printed page 10, more than 3,000 people (as of June 2026) provided over 10,000 comments through 108 events and two online surveys. **That is a meaningful level of participation and this review says so.**

7.2 What the City does not report

None of the published engagement data breaks those figures down by community planning area.

Whether all four communities were proportionately represented cannot be determined from what the City has published.

7.3 What should be published before adoption

Normal Heights and Eastern Area both carry conditions suggesting particularly high advocacy stakes: Normal Heights for its Black population decline and complete designation coverage, Eastern Area for a compositional shift the State's instruments do not register. **If the engagement record cannot establish proportionate representation, the second draft process should include targeted outreach to each of the four planning groups.**

8. What We Ask the City to Change or Demonstrate

Each ask follows from a specific finding above and can be satisfied with data the City already holds.

8.1 Publish a Fair Housing Distribution and Opportunity table. For each of the four communities: existing units, existing deed-restricted units, current-cycle affordable production, proposed capacity, opportunity composition, RCAA status, environmental burden and transit access. **Policy 2.8 encourages equitable distribution; without this table that policy cannot be evaluated by anyone, including the City.**

8.2 Publish residential capacity by community planning area. The draft does not. Until it does, no distribution question in this review can be answered, and the City's own stated capacity ambition cannot be tested against its own fair housing duty.

8.3 Perform and publish the AFFH assessment the plan asserts. The draft states the City will affirmatively further fair housing, reverse patterns of segregation and reduce concentrations of poverty. The spatial analysis supporting those claims is absent from the document.

8.4 Supplement the State's designations with a broader displacement screen. Population change, crowding, rent trajectory and racial composition, applied at community and corridor level. **Eastern Area is the case that proves the need: zero designations, and a compositional shift of 26.0 percent against 42.1 percent.**

8.5 Make the anti-displacement commitments measurable. The anti-displacement and affordable housing policies, 2.9 through 2.18, are more specific than most plans provide and establish no way to determine whether they are working. A baseline, a target, a date and an annual report would fix that.

8.6 Address affordable housing distribution, and say what "to the maximum extent feasible" means in Policy 2.15. Affordable production is concentrated in the plan area's lowest-opportunity community. Policy 2.15 supports onsite units "rather than paying in-lieu fees, to the maximum extent feasible" and names no one to determine feasibility, no criteria and no reporting. **The ask is not that the City remove the fee option, which state law protects;** it is that the qualifier be given meaning. It matters most in Kensington-Talmadge, which holds the plan area's affluence concentration and produces affordable housing at 4.9 units per 1,000 against a citywide 11.8. **The draft already points at this work and stops short of committing to it:** 2.16 supports "evaluation of inclusionary requirements" in a manner that affirmatively furthers fair housing, and 2.17 would "consider" Mid-City's displacement risk, transit access, development feasibility and affordable housing needs as part of future updates to the City's Inclusionary Housing Ordinance. **Support and consideration, directed at a future ordinance rather than at this plan.** The ask is what triggers that evaluation, when, and against what published data. Legal basis in the supporting record at 15.4.

8.7 State what this plan cannot accomplish, and what the City will do elsewhere. Twenty-nine of thirty tracts here are Low or Moderate Resource. Opportunity access for Mid-City residents depends on capacity created in higher-resource communities. **The plan should say so and identify where.**

8.8 Complete the air and noise assessment already committed to, for the geography named in the City's own August 2025 Ideas Report, before the highest-density designations are finalised. **And differentiate residential intensity by measured roadway volume** rather than applying one corridor treatment across a tenfold range of conditions.

8.9 Publish engagement participation data by community planning area, and return to the communities the process did not reach. More than 3,000 residents were engaged across 108 events and none of it is published by community. **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 thirty-year document. **A process that reads quiet as agreement will systematically underweight the community with the most at risk.** Outreach before the second draft should be scheduled, located and translated for people working long or irregular hours.

8.10 Answer community by community, not as one Mid-City. State which of the conditions documented in this review the second draft's own fair housing analysis accounts for and which it does not, in four separate answers rather than a single plan-area narrative.

9. Specific Questions for the Second Draft

We ask the Planning Department to address the following in the second draft or in public responses to comments.

1. **Does the draft plan include an anti-displacement analysis for each of the corridors the plan designates? If so, where can the public review it?**
 2. **What percentage of new units along each priority corridor are proposed to be affordable, and at what AMI levels?**
 3. Does the draft plan apply any anti-displacement conditions – tenant protections, right-to-return policies, relocation assistance – to areas that will see significant upzoning?
 4. How does the plan address the AFFH obligation to promote access to higher-opportunity areas, specifically in Kensington-Talmadge and Normal Heights?
 5. What is the residential capacity of the draft plan by community planning area?
 6. Can the City publish engagement data broken down by community planning area to establish whether all four communities were proportionately represented in the plan's development?
 7. Where is the air and noise assessment committed to in the August 2025 Ideas Report, and will it be completed before the highest-density designations are finalised?
 8. What is the current adoption timeline? The official plan page and published news coverage describe different schedules, fall 2026 against spring 2027 for City Council consideration.
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10. Conclusion: A Stronger Fair Housing Plan Is Still a Housing Plan

The Mid-City Communities Plan Update replaces a plan adopted in 1998, before California law required any of the analysis in this review. It covers the one part of the city that is the inverse of every community comprehensively updated in the last decade: one High Resource tract against sixty-three, and a neighborhood change rate double the citywide figure. **The fair housing content of this plan matters more than it did in any of the twelve that came before it.**

This review does not argue that the plan builds too much housing. Three of the four communities added units while losing population, and the plan area permits at roughly half the citywide rate with seven in ten permits being accessory units. Neither the data nor this organization supports a case against building here.

Nor does it argue that the plan does too little. The anti-displacement policies are more specific than most community plans provide.

The argument is narrower and it is about testing. The plan invokes a fair housing duty and does not measure itself against the fair housing geography the City has already adopted. It encourages equitable distribution and publishes no figure that would let anyone check. It creates capacity and does not publish that capacity by community. Every one of those gaps can be closed with data the City already holds, before adoption, without reducing a single unit.

A plan that tests where its housing lands is a stronger housing plan, not a smaller one. That is what this review asks for.

Terms used in this document

Census tract

A small statistical area the Census Bureau uses to report data, usually holding between 1,200 and 8,000 people. San Diego's city limits contain 311 of them in this analysis, 30 of which sit inside the Mid-City plan boundary. It is the smallest geography at which the figures in this review can be reported.

Community planning area (CPA)

The City of San Diego's own neighborhood planning boundaries. City Heights, Eastern Area, Kensington-Talmadge and Normal Heights are each one, and together they make up the Mid-City Communities Plan boundary. Every figure here that names a neighborhood uses these official boundaries.

Opportunity tier

A four-level ranking published by California's housing department and tax credit committee, placing every census tract in the state in Low, Moderate, High or Highest Resource based on measures of education, economic conditions and environment. It is the State's classification, not this organization's.

Low Resource

The lowest of the State's four opportunity tiers. Twenty-three of the thirty tracts in the Mid-City plan boundary sit here, against 95 of 311 citywide.

Moderate Resource

The second of the State's four opportunity tiers. Six Mid-City tracts sit here.

High Resource

The third of the State's four opportunity tiers. One Mid-City tract sits here, in Normal Heights.

Highest Resource

The top of the State's four opportunity tiers. No tract inside the Mid-City plan boundary sits here; 117 tracts citywide do.

Neighborhood change area

A tract carrying one of the State's Neighborhood Change pathway designations, its marker for a historically lower-income community of color that has since seen substantial racial and economic change. Nine of the thirty Mid-City tracts carry one, against 44 of 311 citywide.

Neighborhood Change pathway

The State's method for identifying neighborhood change, published in 2026. A tract can qualify under Pathway 1A, 1B or 2, each testing a different combination of historical condition, demographic change and housing-cost pressure. This review refers to a tract carrying any of them as a neighborhood change area.

Rate-of-change threshold

Part of the State's neighborhood change method. A tract is tested against regional benchmarks for how fast its income, its racial composition and its rents have moved. The rent benchmark for the San Diego region is 64.5 percent growth since 2013.

Racially Concentrated Area of Affluence (RCAA)

A neighborhood where high-income, predominantly non-Hispanic White households are concentrated well above the regional norm. State law now requires every California jurisdiction's housing element to analyse these areas specifically. One tract inside the Mid-City plan boundary carries this classification.

Persistent RCAA

A tract classified as a Racially Concentrated Area of Affluence at every point measured, rather than one that has recently become or ceased to be one. Tract 20.01 in Kensington-Talmadge is District 9's only one.

RECAP

A Racially and Ethnically Concentrated Area of Poverty, the counterpart to an RCAA. The City's own Housing Element Fair Housing Appendix places two City Heights tracts inside its RECAP cluster.

Affirmatively furthering fair housing (AFFH)

The legal duty, under California Government Code section 8899.50 and AB 686, to take meaningful actions that overcome patterns of segregation and foster inclusive communities, rather than simply avoiding discrimination. It applies to a community plan update as it does to a housing element.

AB 686

A 2018 California law, effective 2019, requiring every housing element to include a data-driven, geographically specific analysis of segregation patterns, disparities in access to opportunity and concentrated poverty, and to set goals and actions addressing what that analysis finds.

AB 1304

A 2021 California law, in effect from 2022, that sharpened AB 686 by requiring every housing element's fair housing analysis to identify racially or ethnically concentrated areas of affluence as well as of poverty, and to show how the sites the jurisdiction plans for housing affirmatively further fair housing. It applies statewide.

Baker Settlement

A binding commitment the City of San Diego entered in March 2025, agreeing to show that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. It is a reporting duty rather than a requirement to build, and it counts projects rather than homes.

CalEnviroScreen

California's tool for scoring cumulative pollution burden and community vulnerability, reported as a statewide percentile from 0 to 100. A higher number means greater burden. City Heights sits at 74.0 against a citywide 37.1.

RHNA

The Regional Housing Needs Allocation, the State's assignment to each jurisdiction of how many homes it must plan for, by income level, over an eight-year cycle.

Capacity

What a plan's land use map would allow to be built, if every site that could redevelop did. It is not a forecast of what will be built, and this review does not treat it as one. The draft does not publish capacity by community planning area.

Permitted

A home the City has authorized. It is not yet a home that exists. This review reports production as permitted or as completed and never computes a rate between the two.

Completed

A home that has been built and finished, as distinct from one that has been permitted.

Below-moderate housing

Homes permitted at any affordability level other than above-moderate: the moderate tier and every tier below it. In practice these are deed-restricted affordable units. This review reports it as units permitted per 1,000

existing homes so communities of different sizes can be compared.

Deed-restricted

A home carrying a legal restriction that keeps it affordable to households at a stated income level for a set period, rather than one that happens to be inexpensive at the moment.

Accessory dwelling unit (ADU)

A small secondary home on a lot that already has a house, sometimes called a granny flat or backyard unit. About seven in ten housing permits in Mid-City are for these, against about two in ten citywide.

Suitable sites inventory

The list of parcels a jurisdiction identifies as able to accommodate its assigned housing need. The City's own inventory places 36.3 percent of its suitable sites inside areas it identifies as carrying displacement risk.

Crowding

A household living at more than one person per room. City Heights' rate is 15.7 percent against a citywide 5.8 percent.

Growth gap

The difference between a community's housing unit growth and its population growth, in percentage points. A positive gap means units were added faster than people arrived. Two of the four Mid-City communities added housing while losing population, and three of the four added housing faster than people arrived.

Displacement risk area

A geography the City's own Housing Element Fair Housing Appendix identifies as carrying elevated risk that lower-income residents will be pushed out. All four Mid-City communities appear in the City's lists.

Margin of error

The range within which a survey estimate is likely to fall. American Community Survey figures for small areas carry wide margins, which is why this review reports some measures at community level rather than tract level.