

Appendix B – Data Inconsistencies

This report takes data from San Diego’s Housing Element Annual Reports, which it is required to file with the state as part of its Housing Element obligations. The data was placed into a spreadsheet, available as Appendix A.

Data contained in the Annual Reports contained several inconsistencies and errors:

The Annual Report lists the total number of projects that used the AHBP, and the total number of affordable and market rate homes in those projects. However, when Circulate did its own calculation of the total number of density bonus projects and homes based on the projects listed in the Annual Report, the total did not match the total given in the Annual Report. For purposes of this project, Circulate used the data contained in the individual project list and totaled the number of units and projects itself.

The 2020 Annual Report indicates that in 2020 there were 38 AHBP projects that created 1,226 affordable homes and 2,447 market-rate homes, for a total of 3,673 homes. According to Circulate’s calculation based on data for individual projects contained in the same Annual Report (without accounting for errors in individual project data), in 2020 40 AHBP projects created 1,326 affordable homes and 1,947 market rate homes, for a total of 3,283 homes. The 2019 Annual Report contains a similar discrepancy.

After making this correction, Circulate discovered that the number of units contained within certain projects in the 2020 Housing Element Annual Report were inaccurate. In particular, the report contains 13 density bonus projects that are grouped together in Table A, on page 21 of the pdf.¹ These projects show no above moderate-income units, but significant numbers of low- and very-low income units. Generally, market-rate units in the City of San Diego would qualify as above-moderate income units for the Housing Element reports. Some of these projects show between one and five units, but indicate that they did not use the density bonus.² This suggests an error on its face, because projects under five units are not eligible for the density bonus.

Moreover, each of these projects included a tracking ID of a different format than other entries. This tracking ID was a project number in the Development Services Department system, rather than an approval number as was used in other entries.

Upon finding building permits for those projects, Circulate found that 11 of those projects do report above-moderate income units, including 390 in a single project.³ By finding permits for all of these projects, Circulate was able to determine that most of these projects were not 100% affordable projects as they were reported on the Hosing Element report, but instead were mixed-income projects.

Another project, Trinity Place, was listed as having 73 very low-income units and 68 market rate units. Because 50% affordable is a highly unusual proportion, Circulate found building permits for this project. The building permit showed that it only had 74 units. Circulate corrected this in our data set in Appendix A to conform to the building permit. This change was confirmed by City of San Diego staff.

¹ https://www.sandiego.gov/sites/default/files/san_diego_annual_progress_report_2020.pdf

² Tracking IDs 624373, 633898, 650640, 659076, 673290.

³ Tracking ID 654500. Building permits are linked in Appendix A.

In total, these changes resulted in an additional 825 units being added to the total.

In order to confirm the number of units that Circulate found in building permits, Circulate requested that San Diego City staff in the Planning and Development Services Departments check the 11 projects that were missing above-moderate income units, plus Trinity Place.

City Staff then informed Circulate that 8 of the 12 projects⁴ they checked were entitled in 2021, two projects⁵ were entitled in 2020, one project⁶ was entitled in 2019, and one project⁷ was never entitled. Based on this, Circulate moved the Howard Apartments project to 2019, and removed the 9 projects that were entitled in 2021.

Compared to the original data found in the spreadsheet, this resulted in a reduction of 386 units, 322 of which were low- or very low-income units.

Due to time constraints, and because the number of units can sometimes change between entitlement and permitting, Circulate did not find building permits for projects that did not have some obvious recording issue in the 2020 Housing Element report. Some spot checking of building permits showed listed unit mixes matching building permits. Circulate also did not request that City staff verify projects other than the 13 requested projects.

The lack of accurate, accessible data impacts the ability to track housing production. It may also raise a red flag for local governments' ability to track and preserve deed-restricted affordable housing units. The City of San Diego should update its record keeping. The California Department of Housing and Community Development should also take steps to ensure that reporting jurisdictions are accurately reflecting their production figures in their annual reports.

⁴ Tracking IDs 624373, 624950 644431, 650640, 654482, 654500, 659076, 673290.

⁵ Tracking IDs 639492, 2368887 (Trinity Place).

⁶ Tracking ID 610921.

⁷ Tracking ID 633898.