



October 25, 2022

Mr. William Hofman, Chairperson
San Diego Planning Commission
202 C Street
San Diego, CA 92102

RE: Item 2 – 2022 UPDATE TO THE SAN DIEGO MUNICIPAL CODE AND LOCAL COASTAL PROGRAM

Dear Chairperson Hofman and Members of the City of San Diego Planning Commission:

On behalf of the undersigned coalition members, we are submitting this letter of comment regarding the update to the City’s Land Development Code. As you know our organizations are routinely involved in these annual updates and value the opportunity to regularly review and update the city’s land development code. We also appreciate the time and effort staff puts into these efforts.

With regard to the 2022 code, we are specifically writing today in **opposition** to the proposed change identified as Item # 5 in the package, which is related to the definition of a newly created “sustainable development area”. We believe the magnitude of this change and the lack of available information demonstrating impacts warrants holding this over to the 2023 Code Update effort.

The reason we are opposed is very straightforward, the proposed change would reduce the amount of developable acreage qualifying for what is presently called a “transit priority area”. While it’s hard to quantify the net reduction, with ranges being given from 2,700 acres to over 14,000 acres, it is clear it is substantial. At a time when we are facing a severe housing

crisis and public opinion polling routinely ranks housing availability and affordability as top 5 issues on voter's minds, why are we even talking about reducing the ability to provide housing in areas served by transit?

Streamlining the development of dense and affordable housing near transit is a key strategy to solving the housing and climate crises concurrently. The City will otherwise fail to reduce GHG emissions from the transportation section, meet its Climate Action Plan (CAP) modeshift goals, and meet its RHNA targets. Anything that adds a barrier to transit oriented development and reduces housing capacity conflicts with the CAP and exacerbates the housing crisis.

We understand there is political pressure coming from the city's planning groups to make this change. These same planning groups have opposed the Council adopted changes to the code that made housing at density in transit served areas easier to achieve, so why are we capitulating to them now? In short, this is not a time to go backwards in order to appease those who don't want new housing in the first place.

In fact, we believe the city should expand qualifying areas. The City should be relying on all modes of access to transit to help meet our modeshift goals, including shared mobility devices, personal scooter, bikes, and public transportation. Only using walking to reduce qualifying developable areas that can help meet our housing needs when new modes are proliferating is just wrong.

In conclusion, we would respectfully request that this item be removed from the code update package and sent back to staff for further consideration. Given the magnitude of these changes and the need for housing, direction should be given to staff to create a program that, at a minimum, has no net loss of developable acreage and, preferably, expands the qualifying acreage in a manner that will pass legal review, while also taking into account the many methods of access people use to access transit. Please let us know if you have any comments or questions.

Sincerely,

Madison Coleman, Policy Advocate
Climate Action Campaign

Jerry Sanders, President & CEO
San Diego Regional Chamber of Commerce

Lori Holt Pfeiler, President & CEO
Building Industry Association of San Diego

Angeli Calinog, President
YIMBY Dems of San Diego

Craig Benedetto, Legislative Advocate
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Jesse O'Sullivan, Policy Counsel
Circulate San Diego

Alan Pentico, Executive Director
Southern California Rental Housing
Association