

February 9, 2023

Council President Sean Elo-Rivera
Councilmember Joe LaCava, District 1
Councilmember Jennifer Campbell, District 2
Councilmember Stephen Whitburn, District 3
Council President Pro Tem Monica Montgomery-Steppe, District 4
Councilmember Marni von Wilpert, District 5
Councilmember Kent Lee, District 6
Councilmember Raul Campillo, District 7
Councilmember Vivian Moreno, District 8

Re: February 14 San Diego City Council Meeting, Item 330

Dear Councilmembers:

The League of Women Voters – San Diego respectfully requests that the City Council defer taking action on the Sustainable Development Areas (SDA) proposal as part of the proposed Land Development Code Update. The SDA proposal raises a number of complex issues which require much further analysis than has been done to date. We have listed some of them below. We also want to thank Mr. Seth Litchney, Housing Programs Manager for the Planning Department who graciously attended our Public Policy Committee meeting on January 30 and patiently responded to all of our questions. Despite this meeting, the League still has a number of reservations and concerns about the Sustainable Development Areas proposal.

The League has adopted comprehensive housing and transportation action policies (see Attachment and unfortunately, the SDA proposal seems to be inconsistent with several of them).

- The League believes that Insufficient research has been done to document that higher transit ridership would actually occur with the change from the ½ mile as the crow flies distance for the current Transit Priority Areas (TPA's) to the 1 mile actual walking distance for the SDA proposal. It seems questionable at best whether potential transit users would be willing to walk up to a mile to or from a major transit stop. We are concerned that without further research, increasing the walk shed to 1 mile could have an unintended consequence of having lower than expected transit ridership with more automobile use, thereby potentially contributing to increased VMT. (See 4th bullet below)
- Unfortunately, there are no incentives to promote mixed-use zoning near transit.
- One of the City's stated objectives associated with the SDA is to increase fair housing opportunities in areas identified as "Highest and High Opportunity Areas" as identified by the CA. Tax Credit Allocation Committee by changing the walking distance to/from a major transit stop from ½ mile to 1 mile. However, this laudable objective appears to conflict with the objective of increasing transit ridership, as transit ridership has been shown to drop off beyond a ½ mile walking distance.



- For the Sustainable Development Areas concept to truly align with the Climate Action Plan, the City should be encouraging compact development with higher densities within close proximity to major transit stops. But this proposal goes in the opposite direction by extending the range from ½ mile (as the crow flies) to 1 mile (walking distance), even after accounting for the change from “as the crow flies” to actual walking distance. Conceivably, the proposal could potentially actually increase Vehicle Miles Traveled (VMT) if people who live in new housing units located ½ mile – 1 mile from a major transit stop choose to drive rather than walk, bike or use a scooter. Given this strong possibility, the League recommends that the City analyze a TPA using ½ mile walking distance to transit and compare it with the ½ mile as the crow flies and 1 mile walking distance.
- It would be much better to phase density increases in with the timing of when major transit stops are scheduled to come online. This could be done by using as a frame of reference the Regional Transportation Improvement Plan rather than the Regional Plan. State law allows either to be used so the City does have the discretion to do this. This would fix the problem of allowing density increases 20-30 years in advance of the major transit stops actually being realized.
- A related issue is that affordable units built under the ADU Bonus Density program may expire in 10 years for very low and low income units and in 15 years for moderate income units and may be eligible to convert to market rate status by the time a major transit stop actually comes into being.
- Another issue which should be analyzed is the need for increased open space when higher densities are allowed. But by encouraging ADUs in rear yards, it is reducing private open space, thereby increasing the need for more public open space which is increasingly hard to find as vacant land suitable for parks and open space is now increasingly hard to find.
- Additionally, there will likely be different impacts in different communities. Communities south of I-8 will have different impacts than those north of I-8. These differential impacts should be evaluated as well. Will Complete Communities Housing Solutions and the ADU Bonus programs be used north of I-8 where most of the Highest and High Opportunity Areas are located?

The Sustainable Development Areas proposal is well intentioned. But as we have pointed out, there are a number of factors which should be analyzed further. All of the above factors should be analyzed with the radius from a major transit stop at ½ mile walking distance as well as the 1 mile walking distance so that the relative costs and benefits of each can be weighed.

After these analyses are completed, it can then be considered in the Housing Action 2.0 package which is expected to come to the City Council later this year.

Thank you for your consideration,

A handwritten signature in black ink that reads "Kim Knox". The signature is written in a cursive, flowing style.

Kim Knox, President
League of Women Voters of San Diego

cc: Heidi Vonblum, Planning Director
Tait Galloway, Deputy Planning Director
Seth Litchney, Housing Policy Program Manager

Attachments: 1

Attachment

Housing Action Policy:

- (a) Promote the use of available and underutilized land resources in compact development patterns that discourage urban sprawl, match jobs and housing and reduce Vehicle Miles Traveled.
- (b) Advocate for climate action plans and goals by locating housing near transit and major employment centers and by the use of sustainable materials and energy resources.
- (c) Support infill housing near transit, jobs and services to reduce greenhouse gas emissions and reduce climate change.

Transportation Action Policy:

- (a) **Transportation should be planned in relation to land use plans.** Transportation and land use planning should be integrated to promote reduced Vehicle Miles Traveled (VMT) through a jobs/housing balance and requirements that land use development facilitate use of transit and other alternatives to single occupant vehicles.
 - **Transit should connect major employment centers with residential communities** to minimize vehicle miles traveled and planning for a variety of modes where possible including transit, biking and walking.
 - **Mixed-Use Zoning near transit should be encouraged in order to facilitate convenience and reduce trips** and vehicle miles traveled.