



April 18, 2025

Heidi Vonblum, Planning Director
City of San Diego
Via email

Re: Revision of Bonus ADU regulations

Ms. Vonblum:

On March 4, the San Diego City Council passed a resolution requesting the Planning Department to return in 90 days with a recommendation for eliminating the Bonus ADU program in single-family residential (RS) zones with a minimum lot size of 10,000 square feet.

A second part of the resolution requests that the Planning Department consider further revisions to the Bonus ADU program in the remaining RS zones, in keeping with the more thorough process of a Land Development Code (LDC) Update.

However, it appears from the Planning Department's 2025 LDC Update webpage that the upcoming May 1 Planning Commission hearing will include *all* proposed revisions to the Bonus ADU program and not just the exclusions of certain residential zones.

This is contrary to both the expectation of the Council's March 4 resolution and the following commitment made in your February 28, 2025, memorandum presented to the Council at its March 4th meeting:

“As part of the 2025 Land Development Code Update process, we plan to share information on our webpage, hold public workshops, receive input, and then bring the item forward for a recommendation from the Community Planners Committee and Planning Commission, *prior to* (emphasis added) presenting the item to Land Use and Housing Committee, and then the City Council. We estimate that this process will allow us to begin the hearing process this Summer.”

Accordingly, Neighbors For A Better San Diego (NFABSD) requests that the Planning Department separate consideration of Parts 1 and 2 of the March 4 resolution, with just Part 1 being considered on May 1, and Part 2 being presented to the Planning Commission only after the proposed Bonus ADU Program amendments, including specific proposed code language, have been published and submitted to public input through public workshops and presentation to the Community Planners Committee.

This process should also include the Planning Department's responses to the nine 2025 Land Development Code (LDC) ADU proposals that NFABSD submitted, along with any other ADU proposals that have been submitted by other parties.

Note that because the February 28 memorandum was not provided to the public in advance of the March 4 Council meeting, the public was denied the opportunity to respond to the specific topics of the memorandum. This is especially important because the memorandum hints at making only minimal changes to the Bonus ADU program.

The inclusion of public comment on the memorandum at the March 4 Council meeting would have allowed the Council to better understand the concerns and recommendations of the public on these topics, potentially resulting in different directions to the Planning Department in the resolution.

Separate consideration of Part 2 of the March 4 resolution through a full code update process would help redress the harm done to the public interest from withholding the memorandum from the public until the Council meeting.

For reference, here is the text of the March 4 resolution:

- 1) Request City Staff to return to City Council within 90 days with an action item to remove applicability of the ADU Density Bonus program from the San Diego Municipal Code, conforming the local ADU Bonus Program to state-mandated ADU regulations for single-family zoned parcels in RS-1-1, RS-1-2, RS-1-3, RS-1-4, RS-1-8, RS-1-9, RS-1-10, and RS-1-11 zoned parcels; and
- 2) Request the City Planning Department to bring forward revisions to the ADU Density Bonus program including, but not limited to, those provided in the February 28, 2025, memorandum to the Land Use and Housing Committee for consideration.

Again, Neighbors For A Better San Diego recommends that Parts 1 and 2 of the March 4 Council resolution be separately considered, with Part 1 being continued with the current process, including consideration at the May 1 Planning Commission meeting, and Part 2 being tracked through the full code update process separately and in parallel with the 2025 Land Development Code Update.

Respectfully,



Geoffrey Hueter
Chair, Neighbors For A Better San Diego

cc: Planning Commission
Mayor Todd Gloria
City Council
Heather Ferbert, City Attorney