



February 9, 2023

Brian Heaton, Senior Housing Policy Specialist
Housing and Community Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

Dear Brian,

I am writing in regard to an email that you sent to Heidi Vonblum, San Diego's Planning Director on December 27, 2022. In this email you supported San Diego's proposed replacement of Transit Priority Areas with a new concept called Sustainable Development Areas. Neighbors For A Better San Diego has extensively analyzed SDAs, Affirmatively Furthering Fair Housing (AFFH) regulations, and HCD's transit-oriented development guidelines, and we do not agree with your assessment that restricting the catchment area for transit-oriented development is in violation of AFFH. The net impact of San Diego's SDA proposal will be to push housing away from transit by making the footprint even larger than San Diego's already overly expansive Transit Priority Map, and it will also include transit stops from the Regional Transportation Plan that may not even exist until after San Diego's 10-15 year ADU affordability deeds expire. A key component of providing opportunity through AFFH is access to affordable housing near transit. This requirement is not met by building housing one-mile from transit and is contrary to HCD's own transit-oriented development guidelines, which give preference to housing projects within one-half mile or even one-quarter mile of transit. And certainly building housing around aspirational transit that is decades in the future is not going to meet the transit needs that residents have today.

The proposed expansiveness of SDAs, which would cover over half of all parcels in San Diego, is not justified by a need to create more land capacity for housing. With the recent completion of the Mira Mesa Community Plan Update, San Diego has twice as much zoned capacity (Adequate Sites) as needed to meet its RHNA target of 108,036. Pending community plan updates will add the zoned capacity for well over 100,000 more units, bringing us to three times our RHNA target.

The above numbers only reflect what is officially counted towards the Adequate Sites Inventory. However, transit-oriented density bonuses add over one million additional homes beyond the Adequate Sites estimate, even if the distance to transit in the SDA definition is reduced to the commonly accepted standard of one-half mile.

Noting that the half-mile distance to transit matches the state's own Transit Priority Area definition, we fail to understand HCD's interference in this code update. Noting the numbers above, we clearly have enough zoned and bonus capacity (over 15x by NFABSD's calculations) to meet San Diego's projected housing needs. Therefore, it is both right and proper for San

Diego to adjust its transit-oriented development regulations to achieve the best possible outcomes for mass transit adoption and climate action.

Your email mentions a veiled threat that HCD may decertify San Diego's Housing Element if it does not increase the distance to transit to one-mile. Please provide justification for this threat, including full details on the "case" that you refer to. Please also elaborate how HCD evaluates Housing Elements, including the data collection, public input, and HCD governance and approval processes.

Respectfully,

Geoffrey Hueter
Chair, Neighbors For A Better San Diego

CC:

Gustavo Velasquez, HCD Director
Megan Kirkeby, HCD Deputy Director, Housing Policy Development
Kyle Krause, HCD Deputy Director, Codes and Standards
Heidi Vonblum, Director, San Diego Planning Department
Seth Litchney, Program Manager, Housing, San Diego Planning Department