



Sustainable Development Area Housing Capacity

Executive Summary

A major deficiency of the Sustainable Development Area (SDA) proposal is that it lacks a full analysis of the housing impact. The Planning Department's Staff Reports have focused solely on the incremental acreage difference between the proposed SDA map and the Transit Priority Area (TPA) map. This limited analysis has been further limited to estimates of acreage changes between SDAs and TPAs and does not include the most pertinent information, which is how many homes those acres translate into.

Reasons for a more complete analysis include:

- Full understanding of housing capacity context and tradeoffs between housing goals and climate action goals based on different alternatives for distance to transit.
- Differential impact on different zones, particularly but not exclusively commercial and single-family residential zones.
- Full implications of elements that have been added during the review process, including mobility zones, CTCAC zones, and Specific Plans
- Consideration of fire hazard zones
- Comparison of maps generated using Regional Transportation Improvement Program and the Regional Transportation Plan

While it is the responsibility of the Planning Department to provide transparent, accurate, and complete analysis to the City Council for purposes of sound decision-making, Neighbors For A Better San Diego has attempted to fill the information gap with its own analysis, which we believe should give the Council reason to withhold approval of the SDA in its current form and direct the Planning Department to make proper revisions that meet San Diego's housing needs without undermining our Climate Action Plan and negatively impacting the quality of life for all San Diegans.

Methodology

A complete analysis of the proposed SDA would consist of a breakdown, by zone, of all of the different elements in the SDA definition. The materials provided by the Planning Department only fill in a few of these elements. To complete the scoping of the

proposal, Neighbors For A Better San Diego has performed its own analysis of the transit distance component, as follows:

We started with the SANDAG Major Transit Stops map. This map is the basis for the current TPA map, which has the following deficiencies:

- Includes Rapid buses that do not meet the state definition of Bus Rapid Transit. In response to our inquiries, SANDAG asserts that Rapid bus lines will be upgraded to BRT standards by 2035, even though it is unclear whether the funding exists to create the dedicated high-speed lanes required to meet the BRT standard. In many locations, particularly in coastal zones, it is unclear whether it would even be physically possible to remove two lanes from existing thoroughfares to create dedicated bus lanes.
- Includes transit stops that are not contained in the Regional Transportation Improvement Program, despite the RTIP being specifically called out as the basis for San Diego's TPA map in the Municipal Code. Further, using the Regional Transportation Plan, which includes stops that may not be built until 2035 or 2050, is contrary to the purpose of San Diego's ADU bonus program, which awards bonus ADUs based on affordability deeds that are 10-15 years. This creates the circumstance of a deed expiring before the transit stop is built.
- Based on a crow flies measurement to transit, contrary to the legislative intent of SB743/21099.

Setting aside the questions above regarding the inclusion of certain stops in the Major Transit Stops map, we next built out a walkshed for the following distances to nearest transit: $\frac{1}{4}$, $\frac{1}{2}$, $\frac{3}{4}$, and 1 mile along a pedestrian path of travel. (The Planning Department's only evaluated a map based on 1 mile walking distance.) Maps were created using ESRI's ArcGIS mapping software, which is the same mapping program used by the City of San Diego and SANDAG.

Note that the Planning Department has asserted in its memos that they only recently had the capacity to generate walking distance maps. However, NFABSD checked with an ArcGIS expert (ArcGIS is the software that is used to generate city zoning maps), who confirmed that this capability has existed since prior to the introduction of the Transit Priority Area. Further, NFABSD's own review of state law indicates that the intended measure of distance has always been walking distance, not the crow flies distance used by SANDAG and the City of San Diego to draw their maps.

Note also that we did not analyze the other conditions cited in the SDA proposal, including CTCAC zones and Special zones, since those are designated for other objectives outside of transit-oriented development. That notwithstanding, we note that the

recently added specific plans are not included in either the webmap or the differential parcel spreadsheet.

Results

The table below shows the number of parcels by zone and distance to transit.

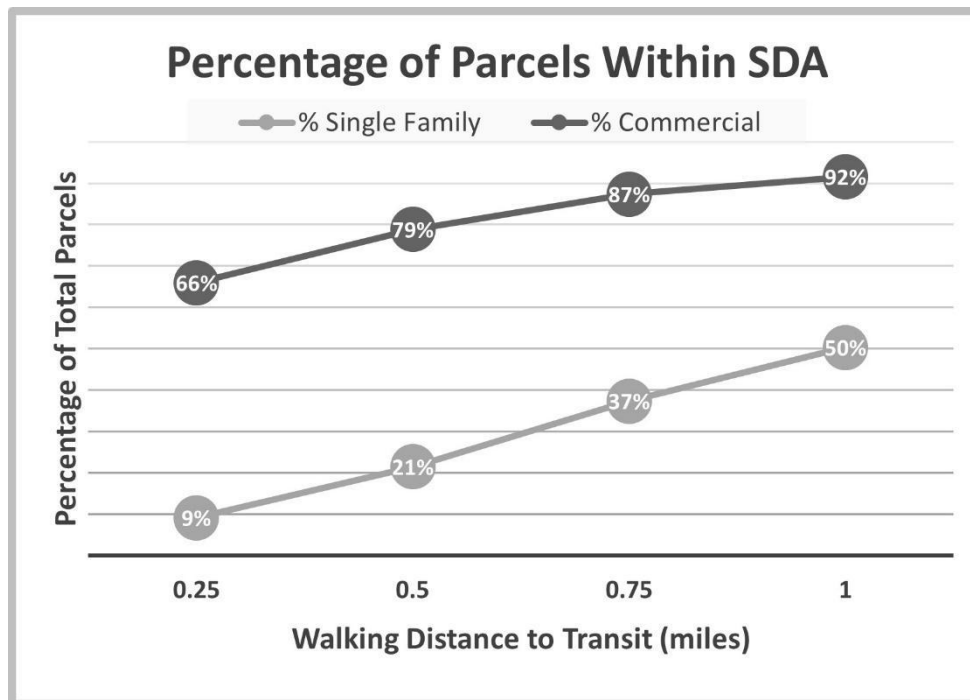
ZONING	1/4 mile (Parcels)	1/2 mile (Parcels)	3/4 mile (Parcels)	1 mile (Parcels)	ALL Parcels	% of ALL Parcels at 1 mile
UNZONED	1,495	2,125	2,730	3,198	5,833	55%
SINGLE FAMILY RESIDENTIAL	18,403	43,358	75,582	101,862	202,565	50%
MINOR MULTIPLE	4,324	9,136	12,944	16,013	20,006	80%
RESTRICTED MULTIPLE	6,762	9,642	10,518	10,711	10,943	98%
MULTIPLE RESIDENTIAL	6,175	9,715	11,222	11,716	12,038	97%
RESTRICTED COMMERCIAL	108	141	169	181	205	88%
COMMERCIAL	8,010	9,576	10,612	11,123	12,148	92%
INDUSTRIAL	2,696	3,623	4,135	4,523	5,676	80%
AGRICULTURAL	32	56	82	97	470	21%
SPECIAL AND/OR MISC.	557	903	1,286	1,631	3,362	49%
Total Parcels	48,562	88,275	129,280	161,055	273,246	59%

The table below shows the acreage by zone and distance to transit.

ZONING	1/4 mile Area (Acres)	1/2 mile Area (Acres)	3/4 mile Area (Acres)	1 mile Area (Acres)	ALL Area (Acres)	% of ALL Parcels at 1 mile
UNZONED	14,596	21,209	25,640	30,763	88,725	35%
SINGLE FAMILY RESIDENTIAL	4,782	10,081	16,915	22,232	49,616	45%
MINOR MULTIPLE	757	1,529	2,121	2,558	3,197	80%
RESTRICTED MULTIPLE	1,236	1,762	1,994	2,068	2,424	85%
MULTIPLE RESIDENTIAL	1,309	2,104	2,502	2,717	3,049	89%
RESTRICTED COMMERCIAL	162	230	341	369	666	55%
COMMERCIAL	5,316	6,225	7,136	7,737	9,723	80%
INDUSTRIAL	4,871	6,615	8,102	9,093	13,906	65%
AGRICULTURAL	177	271	388	507	5,045	10%
SPECIAL AND/OR MISC.	622	959	1,432	1,888	9,526	20%
Total	33,829	50,985	66,570	79,932	185,879	43%

Estimation of Housing Capacity Under SDA Bonuses

The Staff Report highlighted bonus programs that apply to Single-Family and Commercial zones (unlimited bonus ADUs in Single-Family zones and Complete Community Housing Solutions in Commercial zones). The graph below shows the percentage of total Single-Family and Commercial parcels by distance from transit.



The above graph clearly shows that the decision to increase the distance to transit to 1 mile disproportionately impacts Single-Family neighborhoods. If San Diego were to use the commonly accepted distance of one-half mile, SDAs would contain 79% of all San Diego commercial properties and 21% of single-family properties. Increasing the distance to one mile increases the commercial coverage to 92%, a 16% increase, while the number of single-family parcels impacted would increase to over half of all single-family parcels, an increase of 138%.

The City's justification for increasing SDAs to cover almost 60% of all parcels is that it is necessary to meet the City's housing needs; however, the Staff Reports that have accompanied this proposal do not provide estimates of how much housing can be built under various SDA bonus programs, including how changing the SDA's distance to transit would affect those estimates. To fill this gap, NFABSD considered two programs, Complete Communities Housing Solutions (CCHS), which applies to Commercial and other zones that allow at least 20 units per acre, and the Bonus ADU program, which

applies to residential (single-family and multi-family) zones. To avoid double counting existing housing units, we restricted the analysis of CCHS to Commercial zones.

The results of these analyses are shown in the table below.

Zone	Inside/Outside SDA	Distance to Transit	
		0.5 mi	1.0 mi
Single Family Zones	Inside SDA	303,506	713,034
	Outside SDA	477,621	302,109
	Total SF Capacity	781,127	1,015,143
Commercial Zones	Inside SDA	778,122	967,168
	Outside SDA	74,116	42,075
	Total Commercial Capacity	852,238	1,009,242
Capacity to Meet Housing Needs	Total Housing Capacity (SF + Comm)	1,633,365	2,024,385
	RHNA Goal	108,036	108,036
	Over-Capacity (relative to RHNA)	15x	19x

Conclusion

The housing goal for San Diego (Regional Housing Needs Assessment) is 108,036 new units. Whether the SDA walking distance is set to ½ mile or 1 mile, our analysis shows that we have more than enough land capacity (base zoning and density bonuses) to build the homes needed to meet San Diego’s current and future housing needs. Given the vast 15x over-zoning even at ½ mile SDA walking distance, the question of the SDA walking distance is not whether we have allowed for enough homes to be built, but rather where we should be locating those homes to increase access and usage of transit.