



May 15, 2025

To: Land Use & Housing Committee
Re: Item 4 – Accessory Dwelling Unit Regulations

Dear Council Members:

Neighbors For A Better San Diego strongly supports the recommendation of the Community Planners Committee to limit the Bonus ADU program to 3 ADUs citywide, consistent with the current regulations outside the Sustainable Development Area (SDA). Eliminating the SDA distinction would not kill the Bonus ADU program. Not only do 98% of ADU developments in single-family (RS) zones contain 3 or fewer ADUs, but over half of Bonus ADUs are built in multi-family zones, which are not affected by the proposed Bonus ADU amendments.

The unlimited ADU bonus based on the Sustainable Development Area (SDA) is not transit-oriented development because the allowed walking distance of one mile to a major transit stop is well beyond any accepted measure of transit adoption. Specific to San Diego, the most recent SANDAG rider survey¹ indicates that most people do not walk more than one-third of a mile to take transit.

The Bonus ADU program is also not transit-oriented because it includes speculative transit stops from SANDAG's SD Forward plan that may not exist for several decades, if ever.

With regard to affordability, the Bonus ADU program produces deed-restricted units at 110% AMI. According to the 2025 San Diego Housing Commission (SDHC) Income and Rent Calculations², this equates to a rent of \$2,519 for a studio apartment (annual income of \$100,750 for a single person) and a rent of \$3,238 for a two-bedroom apartment (3 person family with a combined income of \$129,500). These are effectively market rate rents and will continue to be so as SDHC updates its rent tables every year.

The ultimate outcome of the Bonus ADU program, then, is to produce market rate housing randomly distributed away from transit across San Diego's single-family neighborhoods.

We don't need the SDA-based unlimited bonus program for that. We already have the regular ADU program and bonus allowances outside the SDA that could be adopted citywide. As noted in the Staff Report, ADU developments of 3 or fewer ADUs, consistent with the bonus ADU regulations outside the SDA, account for 98% of all ADU developments. This begs the question of why San

¹ SANDAG Onboard Transit Passenger Survey, 2023, <https://www.sandag.org/data-and-research/applied-research-and-performance-monitoring/surveys>

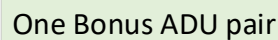
² San Diego Housing Commission Income and Rent Calculations, 2025, <https://sdhc.org/wp-content/uploads/2025/01/AMI-Income-Rent-Chart-2025.pdf>

Diego is spending so much political capital on a program that ultimately is a small percentage of all ADUs, and which has been noted in a previous letter, drives up home prices for would-be homeowners and thwarts the development of critically needed family-sized units³.

In addition, the proposed amendments to the Bonus ADU program introduce further complexity and legal risk for developers into an already uncertain and litigious environment.

To contrast the complexity of the Planning Department's proposed Bonus ADU amendments with the proposal from Neighbors For A Better San Diego (NFABSD), the Community Planners Committee, and other community advocates to remove the SDA distinction and adopt the regulations outside the SDA citywide, NFABSD has created the visualizations below.

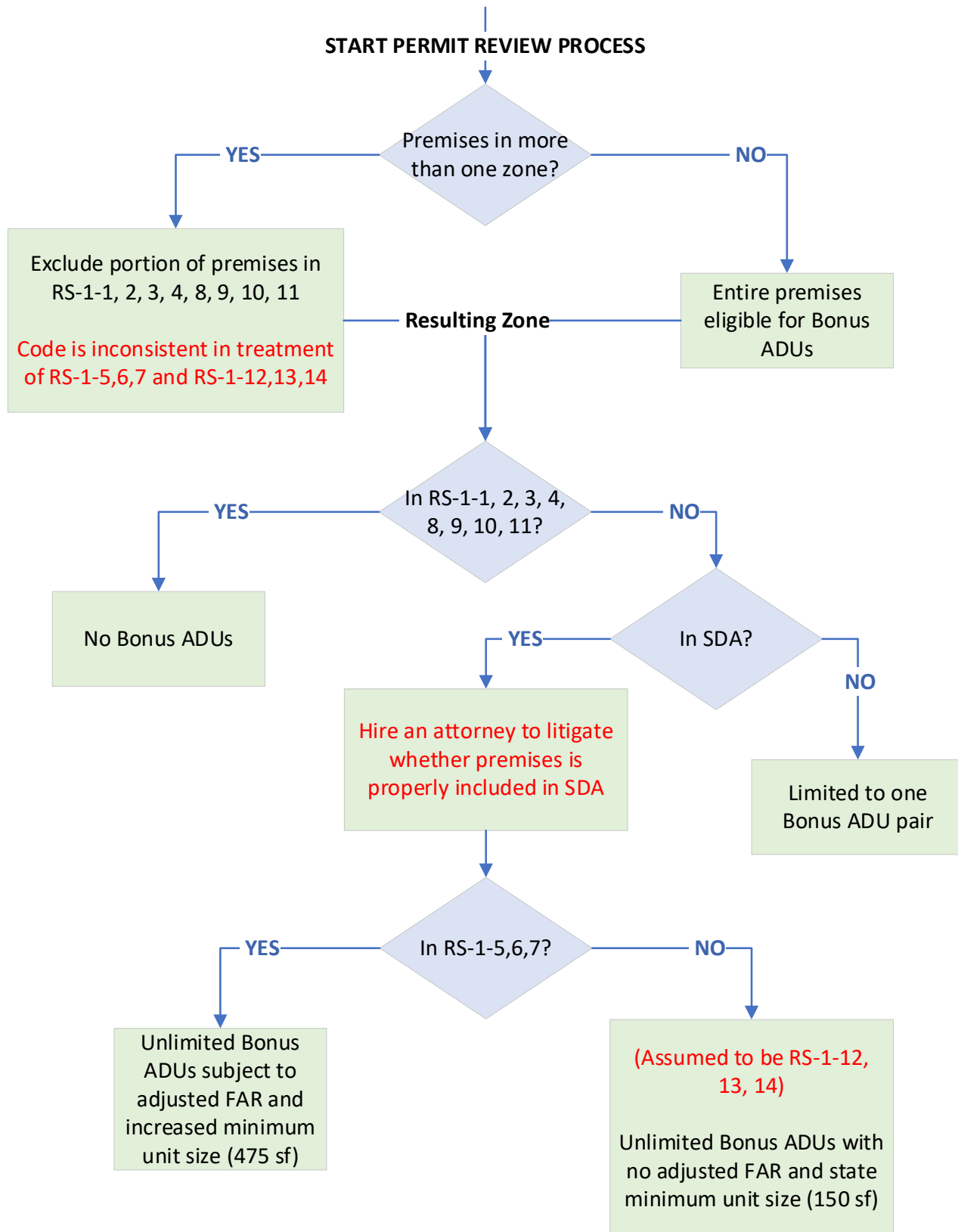
Figure 1. The Community Proposal



One Bonus ADU pair

³ N. Moeder, "These Aren't The Homes We're Looking For," London Moeder Report, July 2022, <http://londonmoeder.com/wp-content/uploads/2022/09/LMA-These-Arent-The-Homes-Were-Looking-For-July-2022.pdf>

Figure 2. The Planning Department's Proposal



The simplest solution is also the best.

Respectfully,

A handwritten signature in cursive script that reads "Geoffrey Hueter".

Geoffrey Hueter, Chair
Neighbors For A Better San Diego