

Equating Acreage to Housing

Executive Summary

A key component of the Planning Department’s Staff Report for the Land Development Code update is the proposed increase in acreage of Sustainable Development Areas (SDAs) over the existing Transit Priority Area (TPA) map that the city is currently using for permitting projects.

In particular the Staff Report cites the following:

- 688 additional acres would be eligible for Complete Communities Housing Solutions (CCHS)
- 4,612 additional acres would be eligible for unlimited Bonus ADUs

What is lacking in the Staff Report is the context of what those acreage changes equate to in terms of additional housing capacity. To fill in this gap in the public discussion of whether the proposed expansion of SDAs is an appropriate policy response to San Diego’s housing needs, Neighbors For A Better San Diego (NFABSD) has performed its own calculations of these conversions.

The result is that the proposed SDA would create the capacity for over 160,000 additional homes. For comparison the recent Mira Mesa Community Plan Update added a zoned capacity of 31,960 additional homes. Therefore, the proposed SDA is equivalent to 5 community plan updates. Further, community plan updates are developed over a period of years with full and robust public input. By contrast, the proposed SDA has only been presented in its current form since January 12, 2023. A Community Plan Update would not be bundled in the Land Development Code update with continual and substantive changes up to the date of its adoption. Similarly, the SDA proposal is a major change to land use policy and should be withdrawn from the Land Development Code update.

Converting Acreage to Housing – Complete Communities

To fill in the missing information in the Staff Report, Neighbors For A Better San Diego has performed its own GIS analysis of the proposed SDA map to determine the total acreage in the SDA by zone and by different distances to transit. These results are summarized in the table below.

COMMERCIAL ZONES		Amount	% of All SD
Parcels	within 0.5 mi	9,576	79%
	within 1.0 mi	11,123	92%
	All SD	12,148	100%
Acreage	0.5 mi	6,225	64%
	1.0 mi	7,737	80%
	All SD	9,723	100%
Increase in acreage over TPA (Dec. 2 memo)		688	7%
Average Units Per Acre		125	
Additional units due to SDA expansion		86,000	
Total Possible Units (0.5 mi SDA)		778,122	
Total Possible Units (1.0 mi SDA)		967,168	

As can be seen, the additional 688 acres eligible for Complete Communities equate to 7% of all commercial acreage in San Diego. (Our analysis focuses on commercial properties because CCHS primarily targets commercial properties that have been rezoned to allow housing above the CCHS threshold of 20 dwelling units per acre.)

Based on a typical unit size of 700 sf, NFABSD calculates that the average density (across all San Diego Mobility Zones) is 125 dwelling units per acre. Applying this density to the 688 acres in the Staff Report, we estimate that these 688 acres equate to 86,000 additional units.

We further calculated the total number of units that could be added just to commercial zones under Complete Communities. At an SDA walking distance of one mile this would equate to 967,168 units.

The Planning Department did not consider alternatives to the proposed one mile walking distance. To provide this important context, NFABSD evaluated what the CCHS capacity would be if the distance was reduced to one-half mile. The result is 778,122.

Converting Acreage to Housing – Bonus ADUs

Neighbors For A Better San Diego's also analyzed the impact of the SDA expansion on Single Family zones. The impacts of the added acreage vis a vis TPAs and the total impact are summarized in the table below.

SINGLE FAMILY ZONES		Amount	% of All SD
Parcels	0.5 mi	43,358	21%
	1.0 mi	101,862	50%
	All SD	202,565	100%
Acreage	0.5 mi	10,081	20%
	1.0 mi	22,232	45%
	All SD	49,616	100%
Average Parcel Size (sf) (0.5 to 1.0 mi)		9,507	
Average Units Per Acre		4.1	
Increase in acreage over TPA (Dec. 2 memo)		4,612	9%
Est. Additional Homes Impacted		18,829	
Potential Additional Units Per SF Parcel Outside SDA (ADU/JADU or SB 9)		3	
Potential Additional Units Per SF Parcel Inside SDA (Bonus ADUs)		7	
Additional ADUs due to SDA		713,034	
<i>Additional ADUs due to SDA expansion (outside TPA)</i>		75,317	
Potential Additional Units Outside SDA ADU/JADU or SB 9)		302,109	
Total Additional Capacity in Single-Family Zones		1,015,143	

An average-sized lot in San Diego (9,507 sf) will support 7 additional ADUs at an average size of 450 sf/unit. This estimate is consistent with current ADU developments inside TPAs across San Diego. Based on this, and accounting for the baseline of 3 units, which would be possible outside the SDA/TPA, the 4,612 acres referenced in the Staff Report would allow for an additional 73,317 units.

Note that state law only mandates that cities allow for a single ADU to be added to a single-family property. Nonetheless, when San Diego passed its Bonus ADU ordinance, it did not perform an EIR for the City's added density, and did not perform any calculations of expected project densities, under the premise that it was "just implementing state law".

Conclusion

If we focus on just the incremental acreage between the current TPA map and the proposed SDA map (ignoring the question of whether the acres that were taken out of the TPA are fungible to the SDA), the proposed SDA would add a capacity for over 161,000 homes. As a comparison, recent community plan updates have added on the order of 30,000 unit capacities, meaning that the SDA proposal has five times the potential impact of a community plan update, yet the SDA is being proposed without the impact analysis and full public input processes that would be included in a CPU process.

Sustainable Development Areas represent a significant change to San Diego's land use policies. As the result of a bad process – being slipped into the Land Development Code update – the Planning Department has made continual changes without the accompanying thorough analysis and public input that would be appropriate for such a major policy change. Therefore, we are asking the City Council to remove SDAs from the Land Development Code update.