



SIERRA CLUB

SAN DIEGO CHAPTER

February 13, 2023

Dear Council President Elo-Rivera and Members of the City Council:

On February 14, the City Council will hear the 2022 Land Development Code update, which includes 84 items most of which are technical in nature. Included, however, in this update, is a major land use decision for which more analysis is needed: the creation of a new geographic area — Sustainable Development Areas (SDAs) — in the Municipal Code where higher density residential can be located.

If approved, the proposal would result in the expansion of two housing incentive programs, the Complete Communities Housing Solutions Program (CCHS) and the Accessory Dwelling Unit Affordable Density Bonus Program (ADUDB) to a larger area of the city. SDAs are areas defined as being within a one-mile walking distance of existing — and future — major transit stations. The area where the two programs have been implemented to date — Transit Priority Areas (TPAs) — is defined as a 1/2 mile “as the crow flies” radius from a major transit station.

The SDAs include significantly more acreage than the TPAs, and their creation is one of the most significant land use proposals to come before the City Council in the past few years. Because the proposal was buried in the Land Development Code package it has only recently come to the Sierra Club's attention.

Based on our review of the proposal and associated issues, we question whether implementation of the proposed Sustainable Development Areas (SDAs) will result in greater access to or ridership of transit or a significant amount of affordable housing.

The Sierra Club San Diego is a proponent of infill housing as evidenced by its strong and vocal support of the SDSU Mission Valley project several years ago. We do not, however, believe a land use change of this magnitude should be approved without a more thorough analysis and environmental review.

Given the importance and complexity of the questions and issues we have identified, the San Diego Sierra Club respectfully requests deferral of the SDA issue to allow the public to thoroughly review and provide input on it.

Making this land use change should not and does not need to be made in haste. It is important to ensure this proposed upzoning will not undermine the city's ability to meet



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the goals of its climate action plan; its affordable housing goals for very low, low, and moderate income households; and will increase transit ridership, and affirmatively further fair housing. The costs and benefits of the proposal need to be understood in relation to transit use, affordable housing, climate, trees, open space and parks, and housing and land values in different communities.

Thank you for your consideration.

Sincerely,

Lisa Ross, Chair
Sierra Club San Diego Chapter

cc: Mayor Todd Gloria