

February 4, 2026

Heidi Vonblum
Director, Planning Department
City of San Diego
202 C St., San Diego
California, 92101



Dear Ms. Vonblum:

On behalf of the Building Industry Association of San Diego (BIA), I respectfully submit the feedback below regarding the proposed 2026 Land Development Code proposed updates. As an organization representing various aspects of the homebuilding industry, the feedback from members was wide ranging, and what is below is not intended to be an exhaustive list but a tool for discussion. Our members collectively deliver a substantial share of the City's housing needs, including a growing portion of income-restricted and middle-income projects. Our comments are focused on ensuring that the proposed amendments are administrable, legally consistent with state law, and feasible in real-world construction and financing conditions.

The BIA is appreciative of the Department's hard work in the outreach and drafting of this immense list of changes. We understand this is not an easy task, and that land use is often a controversial and difficult subject in which to work. The thoughtfulness of the team is to be commended.

We have broken down our feedback into areas of support, concern/need more information, and opposition. They are below.

Support:

#6: Complete Communities Housing Solutions - For- Sale Dwelling Units: This is a positive addition that leverages an already successful program to create for-sale product in the City. We are eager to see this implemented and look forward to partnering with the City to ensure that for-sale housing is being delivered to San Diegans. We are pleased to provide some suggested amendments to the proposed language in our attached document to ensure real applicability of this new program.

#26: Density Bonus in Exchange for Affordable Housing Units - Base Zone Regulations- The additional flexibility is welcomed, and we would request that it be expanded to Complete Communities as opposed to limited to purely affordable projects.

#37: Definitions - Major Transit Stop- Modifying this definition will provide what we anticipate to be a moderate improvement in areas of opportunity to build.

#40: Small Lot Subdivisions- Multiple Dwelling Unit Zones- BIA has long supported expanding ministerial projects and appreciates the City's on-going willingness to expand ministerial. While a state initiative, it is nonetheless a positive addition. Our support is predicated upon the use of the state definition of fire zones as listed in the initiating bill.

#41: Small Lot Subdivisions- Single Dwelling Unit Zones- Again, BIA is supportive of the implementation of pro-housing policies from the state. We would greatly value any opportunity to leverage such momentum to make significant and practical improvements to the Subdivision Map Act in partnership with the City.

#51: Affordable Housing Regulations - For-Sale Affordable Dwelling Units and Nonprofits-This appears to be a complementary policy to the aforementioned CCPHS for-sale amendment.

Additional Questions:

#39: Tentative Maps - When a Tentative Map is Not Required- We understand the Department's position to align with state law, and further we believe that EMX is a commercial zone and qualifies for the exemption. Language clarifying that EMX would be treated as such either in the code itself or corresponding staff report is critical to providing clarity. Absent explicit clarification, BIA is concerned this will result in inconsistent application across development services reviewers, increasing entitlement risk and processing time for otherwise ministerial projects.

Support if Amended:

#25/#28: Complete Communities Housing Solutions – We have intentionally paired these two items in our review as it appears they serve similar goals. Generally, we are supportive of the direction of the City but believe it could be improved. The text “Need not be identical” is stricken in the draft and we request that remain as it is necessary for flexibility. Further, we would ask that the language in the City's code be consistent with state law across the various programs.

Recommend Removal or Further Study:

#7: Complete Communities Housing Solutions - Development Impact Fee Waivers- As referenced in our companion letter, we are hopeful that there is room for a solution that provides some element of DIF for smaller units in CCPHS without hurting production. Simply put, the current proposal is damaging to the CCPHS program and fails to consider the necessary bedroom mixes that make projects feasible in an already expensive building environment.

#9: Central Urbanized Planned District - Moving and Storage Facilities- Broadly speaking, we are to any unilateral removal or use that does not directly and negatively impact surrounding communities. Further, our organization would point out that external storage opportunities are an important consideration as home sizes trend smaller.

#17: Residential Base Zones - Setback Requirements- The BIA is concerned about where this would apply, and if it would interfere with the existing ministerial process. As written, the BIA members feel that there is not sufficient clarity in the language which will ultimately be leveraged by the anti-housing community. Currently, the dynamics with City reviews has made builders concerned about variable interpretations, and believe that this could have an outsized impact on infill development. We request that this be held until specific standards are developed and adopted, and we would like to request that we be included in that process.

#29: Complete Communities Housing Solutions - Offsite Requirements- Our members report that the significant reduction in timeline to produce the required affordable units in such an arrangement proves very problematic. The current timeframe, which is multiple times longer than the proposed 12 months, can still provide challenges to production. Without understanding the problem that this aims to solve, we would request that this be removed or held for further discussion.

#30: Dwelling Unit Protection Regulations - Recorded Covenant Requirement- We would request that we approach this issue with the Housing Commission and identify an alternative path to resolve the issue. As summarized, we are concerned it could challenge the existing process with utilities and redevelopment processes.

#34: Landscape Regulations - Protection of Existing Trees and Shrubs- Currently, projects are reporting difficulty working with the City to resolve existing tree protection issues, and this amendment could further complicate those discussions. Our members have suggested that a more functional policy could be to base the new tree or tree preservation based on landscape guidelines in the community plan. There are some recent case studies that demonstrate the tension in dense areas ripe for development that lose valuable land by repurposing it for trees instead of homes that we would be happy to discuss with you. More specifically, we are comfortable with adjusting the language by removing “to preserve and protect existing trees and shrubs” but keeping the language on biodiversity, if the City would consider that suggestion.

#91: Residential, Commercial, and Mixed-Use Base Zones - Transition Planes- This proposal risks undermining recently adopted pro-housing policies by re-introducing form-based constraints that negate the benefits of increased base density. Without adequate flexibility, the BIA believes this will artificially limit the ability to produce housing, and force development into less

appealing structures which further exacerbates the tension building in less-dense areas. Following such significant upzoning done by the Department and City leadership, it is troubling that we would minimize opportunity, particularly at a time when significant policies like Neighborhood Homes for All would rely on the ability to build upward.

#98: Parking Regulations - Screened Parking- We are concerned about the impact of this proposed change to FAR.

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Thank you for your consideration of this feedback. Given the scope of the proposed amendments, the BIA would welcome participation in focused technical working sessions on the items identified above to ensure the final version of the code update achieves the City's housing objectives without unintended consequences. For additional discussion, please contact Stefanie Benvenuto.

Sincerely,

A handwritten signature in cursive script that reads "Aimee Faucett".

Aimee Faucett

President & CEO

San Diego Building Industry Association

LDC Update 2025 Changes

DIF Waiver Elimination:

§143.0720 Density Bonus in Exchange for Affordable Housing Units

(d) A for-sale affordable housing *density* bonus agreement shall utilize the following qualifying criteria:

(1) Very low income - At least 5 percent of the pre-density bonus dwelling units in the development shall be affordable to very low-income households at an affordable housing cost that does not exceed ~~30~~ **35** percent of 50 percent of the area median income, as adjusted for household size appropriate for the dwelling unit. Low income - At least 10 percent of the pre-density bonus dwelling units in the development shall be affordable to low-income households at an affordable housing cost that does not exceed 30 percent of 70 percent of the area median income, as adjusted for household size appropriate for the dwelling unit.

(2) Low income - At least 10 percent of the pre-density bonus dwelling units in the development shall be affordable to low-income households at an affordable housing cost that does not exceed ~~30~~ **35** percent of 70 percent of the area median income, as adjusted for household size appropriate for the dwelling unit.

(3) *Moderate Income* – At least 10 percent of the total *dwelling units* in a common interest development development, as defined in California Civil Code Section 4100, shall be affordable to *moderate income* households at an affordable housing cost that ~~is not less than 28 percent of the gross income of the household, nor does not~~ **is not less than 28 percent of the gross income of the household, nor does not** exceed ~~s~~ 35 percent of ~~110~~ 120 percent of the area median income, as adjusted for household size appropriate for the *dwelling unit*. To qualify, all *dwelling units* in the *development* shall be offered to the public for purchase.

§143.1010 Incentives in Exchange for Sustainable Development Area Affordable Housing and Infrastructure Amenities

An *applicant* proposing *development* that is consistent with the criteria in Section 143.1002 shall be entitled to the following incentives:

(a) through (e) [No change in text.]

(f) Waiver of Development Impact Fees if the *development* provides a residential *density* that is at least 120 percent maximum permitted *density* of the applicable base zone or Planned District for the following:

(1) [No change in text.]

~~(2) All *dwelling units* that do not exceed 500 square feet.~~

(2) *Dwelling units* that do not exceed 500 square feet, up to a maximum of 30% of total *dwelling units*.

Complete Communities for Sale:

§143.1016 Required Provision of For-Sale Affordable Dwelling Units

(a) In accordance with Section 143.1002(a)(1), an *applicant* requesting application of the regulations in this Division shall provide a written agreement to provide for-sale affordable *dwelling units*, entered into by the *applicant* and the President and Chief Executive Officer of the San Diego Housing Commission and secured by a deed of trust, that meets the following requirements:

(1) Provides at least 15 percent of the *dwelling units* in the *development*, excluding any additional *dwelling units* allowed under a *floor area ratio* bonus, affordable to *very low-income* households at a cost that does not exceed ~~30~~ **35** percent of 50 percent of the area *median income*, as adjusted for household size;

(2) Provides at least 15 percent of the *dwelling units* in the *development*, excluding any additional *dwelling units* allowed under a *floor area ratio* bonus, affordable to *moderate income* households at a cost shall not be less than 28 percent of the gross income of the household, nor exceed 35 percent of ~~110~~ **120** percent of the area *median income*, as adjusted for household size; and

(3) Provides at least 10 percent of the *dwelling units* in the *development*, excluding any additional *dwelling units* allowed under a *floor area ratio* bonus, affordable to *low income* households at a cost that does not exceed ~~30~~ **35** percent of 70 percent of the area *median income*, as adjusted for household size.

(4) As an alternative to the requirements in Section 143.1016(a)(1)- (3), an *applicant* may meet one of the following requirements:

(A) Provide at least 40 percent of the *dwelling units* in the *development*, excluding any additional *dwelling units* allowed under a *floor area ratio*

bonus, affordable to very low income households at a cost that does not exceed 30 35 percent of 50 percent of the area median income, as adjusted for household size; or

(B) Provide at least 100 percent of the dwelling units in the development, excluding any additional dwelling units allowed under a floor area ratio bonus, affordable to moderate income households at a cost, including an allowance for utilities that does not exceed:

(i) 30 35 percent of 80 percent of the area median income, as adjusted for household size for at least 50 percent of the required for-sale dwelling units; and

(ii) 30 35 percent of 120 percent of the area median income, as adjusted for household size for the remainder of the required for-sale dwelling units.

(C) The number of required affordable dwelling units for development located in FAR Tier 1 shall be determined by multiplying the proposed number of dwelling units in the development with the maximum base floor area ratio, illustrated in Figure H of the Centre City Planned District Ordinance in Chapter 15, Article 6, Division 3, then dividing by the proposed floor area ratio of the development and multiplying by the percentages of affordable dwelling units required in Section 143.1016(a)(1)-(3) or 143.1016(a)(4), consistent with current building standards for new housing

(5) For for-sale dwelling units to be counted as affordable and meet the requirements of this Division, the following qualifying criteria shall be met:

(A) The affordable dwelling units shall be comparable in bedroom mix and amenities to the market-rate dwelling units in the development, as determined by the San Diego Housing Commission, except that the affordable dwelling units shall not be required to exceed three bedrooms per dwelling unit. The affordable dwelling units shall have access to all common areas and amenities provided by the development. The square footage and interior features of the affordable dwelling units shall be good quality and consistent with current building standards for new housing in the City of San Diego.

(B) The initial occupant of all for-sale affordable dwelling units shall be a very low income, low income, or moderate income household.

(C) Prior to, or concurrent with, the sale of each affordable *dwelling unit*, the *applicant* shall require the buyer to execute and deliver a promissory note in favor of the San Diego Housing Commission, so that the repayment of any initial subsidy is ensured.

(D) Each for-sale *dwelling unit* shall be occupied by the initial owner at all times until the resale of the *dwelling unit*.

(E) Upon the first resale of a *dwelling unit*, the seller shall comply with all conditions regarding the sale of a *dwelling unit*, as applied by the San Diego Housing Commission, and as set forth in California Government Code section 65915(c)(2).

(6) As an alternative to the requirements in Section 143.1016(a)(1)-(3) or 143.1016(a)(4) to provide the required for-sale *dwelling units* onsite, the required for-sale *dwelling units* may be provided on a different *premises* from the *development* subject to all the following requirements:

(A) The required for-sale *dwelling units* shall be located on a receiver site that is located within a *Sustainable Development Area* and one of the following Resource Opportunity Areas identified by the California Tax Credit Allocation Committee when the *development* application is *deemed complete*:

(i) High Resource Opportunity Areas;

(ii) Highest Resource Opportunity Areas;

(iii) Moderate Resource Opportunity Areas located in the same community planning area and Council District of the *premises* of the *development*; or

(iv) Moderate Resource Opportunity Area within three miles of the *premises* of the *development*.

(b) Nothing in this Division shall preclude an applicant from using constructed or rehabilitated affordable *dwelling units* constructed by another *applicant* within 12 months of a deemed complete application for *development* to satisfy the requirements of this Division, including contracting with an affordable housing developer with experience obtaining tax-exempt bonds, low income housing tax credits, and other competitive sources of financing, upon approval by the San Diego Housing Commission subject to the following:

(1) Affordable *dwelling units* shall not be rent restricted under any other program or policy by any entity;

(2) Affordable *dwelling units* shall have not received a loan or project-based vouchers from the San Diego Housing Commission; and

(3) Upon the approval by the San Diego Housing Commission, affordable *dwelling units* may be funded by other sources of financing.

Rancho Bernardo Community Planning Board

12463 Rancho Bernardo Road #523, San Diego, CA 92128

www.rbplanningboard.com

February 10, 2026

City of San Diego Planning Commissioners
7650 Mission Valley Road, MS DSD 1A
San Diego, CA 92108-4423
(sent via planningcommission@sandiego.gov)

SUBJECT: February 19, 2026 Planning Commission Hearing; Comments Related to Proposed Revisions to the City of San Diego Land Development Code

Planning Commissioners:

After an extensive review of the proposed changes to the Land Development Code (LDC) recommended by the Planning Department, the Rancho Bernardo Community Planning Board (Planning Board) has identified concerns and/or requests for revisions related to some of the recommendations that have the potential to affect the Rancho Bernardo community, as well as other communities outside of the more transit-oriented areas of the City. The Planning Board took into consideration how the changes could affect current and future residents of our community, as well as how it could affect our community's overall quality of life, including, but not limited to, ease of access, effects on traffic circulation, adequate availability of parking, use compatibility, reasonable accommodations, and the protection of natural resources.

On January 15, 2026 after completing an extensive review of the 107 proposed changes to the LDC, the Planning Board determined that twenty of the proposed change were most relevant to the Rancho Bernardo community and/or are regionally significant. With the exception of Item 98, where one member voted in opposition to that specific change, the Planning Board unanimously approved sending a letter requesting that the following corrections and/or revisions be made to the Planning Department's list of proposed changes to the LCD. The Planning Board also raised concerns related to the Planning Department's continued refusal to correct language in the LDC related to the protection of Environmentally Sensitive Lands, as addressed below.

Item Not Included in the Code Update, But Should Have Been – Environmentally Sensitive Lands

Despite multiple requests for corrections from this Planning Board and other interested parties prior to the creation of the current list of code changes, the Planning Department continues to ignore the need for revisions to the LDC related to CIP/Public Projects that deviate from the Environmentally Sensitive Lands (ESL) Regulations. It is clear from the statement presented in a Memorandum from the Planning Department, dated December 2, 2019, to the Planning Commission and City Council, that reducing the discretionary process from a 5 to a 2 “does not apply to deviations from the historical, ESL, or archeological resources regulations”. We request that this item be added to the list of LDC corrections that are considered by both the Planning Commission and City Council, as the Planning Department has to date refused to address this issue.

Comments on the Planning Department's Current List of Proposed LDC Revisions

Item 1 - Increases in Penalty Assessments for Code Violations

Comment: Currently, the penalty assessments for a code violation range from \$100 to \$1,000. Increasing the amount of penalty to up to \$10,000 or greater as authorized by City Council Resolution implies there is no limited to the penalty that could be imposed on a violator. Due to the significant increase in the amount of the penalty, §12.0908(c) should be revised to provide guidance for which types of actions warrant penalties of \$10,000 or more.

Item 3 - Commercial Base Zones Regulation Amendments - Mixed Use in Mobility Zones 2 & 3

Comment: Rancho Bernardo has been identified as a High Resource Area and includes areas designated as Mobility Zone 2. The Board has questions regarding how this proposal could affect the long-term availability of close to home commercial uses in our community. What are the requirements for ensuring that currently available grocery, pharmacy, and other residentially-related commercial uses will be retained in proximity to existing residential development? If they are eliminated, total vehicle miles traveled will increase, as adequate opportunities to use transit are not available in this portion of the City.

Item 5 - Inclusionary and Offsite Affordable Housing Requirements

Comment: Rancho Bernardo is identified as including areas of high and highest resource neighborhood opportunities. More information is requested to understand how, if at all, these requirements affect existing uses in areas of high and highest resource neighborhoods.

Item 7 - Complete Communities Housing Solutions - Development Impact Fee (DIF) Waivers

Comment: The Planning Board strongly supports the removal of the waiver for development impact fees (DIF), as DIF are intended to support the needs of all residents in a community and should therefore be required for any new development.

Item 11 - Noise Regulations - Sound Level Limits

Comment: We support this change provided it does not allow for night time construction activity, an activity that has significant health effects on residents whose sleep is constantly disrupted by construction back up alarms. Approval for specific situations where sound level limits are to be exceeded under this code change, should include a requirement for prior notice to residents who could be affected by excessive nighttime noise levels. Finally, please ensure that this proposed revision to the LDC does not apply to night construction activity.

Item 13 - Reaffirms the Definition of a Transit Priority Area

Comment: This revision does not change the “as the crow flies” way of measuring distance, therefore, areas in Rancho Bernardo located to the east of I-15 that are included in the TPA will continue to be subject to the requirements of a TPA despite the fact that access to the transit center requires walking 20 to 36 minutes (according to Google Maps), depending upon the starting point on the east side of the freeway, over varying topography including a steep hill to access the transit center on the west side of I-15 without the use of a car. Most individuals do not have the time, and some the physical ability, to walk from 1 to 1.5 miles in order to access the Rancho Bernardo Transit Station from east of I-15. As a result, the reduced parking requirements to any new residential

development on the east side of I-15 could be development without adequate parking resulting in a significant burden for new residents, as well as impacts to the surrounding commercial and other non-residential properties, as residents try to find alternative places to park so they can efficiently travel to work, get kids to school, and meet the other everyday needs of families living in areas where transit is limited or lacking.

Item 20 - Sign Regulations (Cannabis)

Comment: We strongly support adding to LDC Section 141.0504(d) and Section 142.1210 (E) that the use of the cannabis leaf symbol is prohibited on any sign. We also request that the City initiate LDC changes requiring that any signage, both on and off site, including billboards, be regulated to avoid content related to the use of cannabis aimed at under age individuals.

Item 22 - Development Impact Fees – Onsite Park Requirements

Comment: We recommend support of this change, but also request that additional LDC changes be made to ensure that new housing proposals are required to provide timely funding to support new or expanded parks in all communities when additional housing is proposed.

Item 25 - Affordable Housing Regulations

Comment: This item is described as “subject to further revisions by the Planning Department prior to any public hearing.” No new revisions have been made public; therefore, we request that planning groups be provided adequate time to review and provide comments on any additional revisions to affordable housing regulations prior to a public hearing on this item.

Item 36 - Environmental Determination Appeals (Public Stormwater Facilities)

Comment: Routine maintenance of existing public stormwater facilities needs to be defined, as the removal of old facilities to be replaced with new facilities particularly if the location changes (which has occurred in the past) does not constitute routine maintenance. Many stormwater facilities occur in areas that support sensitive habitats, including environmentally sensitive lands. When “routine maintenance” includes potential impacts to native vegetation, the action should require public notice and an opportunity for public comment.

Items 40 & 41 - Small Lot Subdivision Multiple Dwelling Unit Zone and Small Lot Subdivision Single Dwelling Unit Zones

Comment: In accordance with SB 684, these uses will not be permitted in areas identified as High and Very High Fire Hazard Severity Zone. As a community that includes these fire hazard severity zones, the location of such developments should not impact wildfire evacuation routes.

Item 42 – Vehicle/Vehicle Equipment Sales & Service Uses, Hydrogen Vehicle Fueling Stations

Comment: We support adding hydrogen vehicle fueling stations as a permitted use, along with applicable development and use regulations, but would also like to see the LDC address the need for additional locations for electric car charging stations throughout the city.

Item 55 - Parking Ratios for Affordable Housing

Comment: The half-mile requirement (with an “as the bird flies” measurement) needs to address significant landform issues that substantially increase the actual walking distance and time required to access to a major transit stop. From various locations along Bernardo Center Drive, the walking route to the transit center is approximately one to 1.5 miles depending upon the actual location of the development. The average time needed to walk from this area to the transit center is 23 to 36 minutes based on mileage; however, this does not take into consideration the varying topography that would likely result in longer walk times. Most individuals would not have the time and/or the physical ability to walk one to one and half miles to access the Rancho Bernardo Transit Station of east of I-15. Therefore, reduced parking requirements for affordable housing provided to the east of I-15 will only result in residents seeking parking in adjacent commercial and residential areas of the community. This is a burden to both the new residents, who deserve adequate parking, and existing property owners.

Item 85 - Appeal Fees – Project and Environmental Appeals

Comment/Request for More Information: This amendment, which increases the fee for appealing a project, further reduces the public’s ability to address projects that impact communities, as well as environmentally sensitive lands. Under Process 2, there is no public hearing, therefore, citizens must first pay a fee just to provide public comments at a public hearing on a proposal that has the potential to impact a neighborhood and/or environmentally sensitive lands. With this change, the City is essentially cutting the public out of any opportunity for comment during the initial decision-making process. This change needs to provide additional details related to the fees, and address the lack of public noticing and the inability of the public to provide comments without first paying a fee. We request that any initial action on a project that could adversely impact communities or the environment provide the opportunity for public comment without the requirement to pay a fee. Additionally, CPGs should be provided at least one free appeal per year.

Item 89 – Public Right-of-Way Permits, Wireless Communication Facility Equipment

Comment: It is unclear what areas of the public right-of-way could be impacted by the installation of larger wireless communication utility equipment cabinets (facilities defined as up to 48 inches in width and height). Could installation impact an existing or planned sidewalk? If so, how are required accessibility standards met under these circumstances? Please request that the Planning Department provide more details related to the protection of adequate access for all.

Item 91 – Transition Planes and Buffers from Adjacent Freeways

Comment: This proposal needs to be more fully described as it is not entirely clear what is being proposed. If in fact this proposal requires adequate transition in bulk and scale between lower and higher density development, as well as in areas adjacent to open space zones, then this proposal would have our support.

Item 94 – Wireless Communications Facilities Regulations

Comment: This proposal, which “Streamlines” the review process for wireless communication facilities, including eliminating the public involvement process, requires some clarifying language due to the extent of the revisions being proposed. Additional review is therefore needed once additional details have been provided.

Item 97 – Promenades and Active Sidewalks – Relocating Accessible Parking Spaces

Comment: This change is proposed to accommodate greater flexibility for applicants by allowing them to relocate accessible parking spaces either within the same block perimeter or within 500 feet of their original location when incorporating a promenade and active sidewalk.

According to ADA.gov, relocating accessible parking spaces counts as an alteration, requiring that the new location provide equivalent or better access. The LDC should acknowledge this requirement. This includes maintaining the shortest accessible route to entrances, ensuring spaces are on the most level ground, providing clear dimensions (96" wide space + 60" aisle, or 132" wide space + 96" aisle for vans), ensuring a firm, stable, slip-resistant surface and adequate vertical clearance (98" for vans), and providing proper signage. The City has an obligation to ensure accommodations for all residents, including those with disabilities.

Item 98 – Parking Regulations (Screened Parking)

Comment: The vote on this item, which would require screening for facades fronting the public right-of-way, was not unanimous, but the majority of the Board voted to support this proposal.

Item 102 – Mobility (VMT Reduction Measures Buy-Out Fee for Mobility Zones 2 and 3)

Comment: We recommend denial of this change, as this action appears to allow developers to avoid implementing VTM Reduction Measures in Mobility Zone 2 within the community where impacts will occur. If the intent of VTM reduction measures to offset impacts from specific developments, then measures should be implemented in the communities where the project is proposed. As a large area of Rancho Bernardo west of I-15 and various potential future residential areas east of I-15 and west of Bernardo Center Drive are located in Mobility Zone 2, if the City is serious about reducing VMT, then the funds should be used in Rancho Bernardo where the impact is occurring and accessibility to the transit center without a car is limited by distance and changes in topography.

Item 107 – Replacement Parking for Streetaries, Active Sidewalks, Outdoor Dining, etc

Comment: It appears this amendment is needed to implement AB 2097, which prohibits the requirement of minimum parking for developments within the Transit Priority Area. The LDC should state that any changes to the location or availability of accessible parking spaces must comply with the required ADA Accessibility Standards.

Conclusion

The Rancho Bernardo Community Planning Board thanks the Commissioners for the opportunity to provide these comments. We encourage the Commissioners to evaluate the effects of all changes to the LDC on existing and future residents and to ensure that everyone’s quality of life and ability to address their everyday needs are met by the regulations in the Land Development Code. The effects of some of these proposed changes could have a significant impact on the quality of life for current and future residents. These effects require serious consideration by our decision makers.

Sincerely,

Robin Kaufman

Robin Kaufman

Chair, Rancho Bernardo Community Planning Board



2488 Historic Decatur Rd, Suite 220
San Diego, CA 92106

(619) 523-1930
AtlantisSD.com

February 13, 2026

Planning Commission
City of San Diego
7650 Mission Valley Road
San Diego, CA 92108

Regarding: Land Development Code, item #68 – MCAS Miramar Airport Land Use
Compatibility Plan Consistency with Land Development Code

Dear Chair and Planning Commissioners:

On behalf of IDS Real Estate Group, we support the edits and updates included in the LDC Update 2025/2026.

We submitted a request to modify Land Development Code, §132.1510, Table 132-15D relative to making Table 132-15D consistent with the MCAS Miramar Airport Land Use Compatibility Plan (MCAS Miramar ALUCP), Noise Compatibility Policies Criteria Table MIR-1. In reviewing item 68 of the proposed LDC changes Agriculture and Vehicle & Vehicular Equipment Sales & Services categories were missed; therefore, Table 132-15D should be revised to allow the use category, per Table MIR-1 of the MCAS Miramar ALUCP.

68	Airport Land Use Compatibility Overlay Zone - Noise Compatibility for the Marine Corps Air Station (MCAS) Miramar Airport Influence Area	<u>132.1510 - Table 132-15D</u>
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Specifically, the MCAS Miramar ALUCP MIR-1 Table conditionally allows agriculture (except residences and livestock); greenhouses, and fishing; and auto sales & repair service while the existing LDC Table 132.-15D prohibits the corresponding Agriculture, and Vehicle & Vehicular Equipment Sales & Services use categories. We have included portions of the appropriate tables from the MCAS Miramar ALUCP and the Land Development Code for your review.



Based upon the inconsistency, we respectfully request that the LDC Update, item 68, be modified and that Table 132-15D indicating the Agriculture, and Vehicle & Vehicular Equipment Sales & Services use categories are allowed subject to the criteria listed in the MCAS Miramar ALUCP, Table MIR-1. The modification would bring §132-1510 and Table 132-15D into compliance with the MCAS Miramar ALUCP, MIR-1 Table.

If you have any questions or need additional information, please contact us at 619 523-1930.

Sincerely,



Theodore Shaw
 Principal

- cc Matt Traino, IDS Real Estate
- Shane Isdamer, IDS Real Estate
- Bo Peterson, Allen Matkins
- Craig Benedetto, California strategies

Table 132-15D
Noise Compatibility Criteria for MCAS Miramar, Brown Field Municipal Airport,
Montgomery-Gibbs Executive Airport, and NOLF Imperial Beach Airport Influence Areas

Use Categories/ Subcategories [See Section 131.0112 for an explanation and descriptions of the Use Categories, Subcategories, and Separately Regulated Uses]	Aircraft Noise Exposure (dB CNEL)			
	60-65	65-70	70-75	75-80
Open Space				
Active Recreation	P	P ¹	-	-
Passive Recreation	P	-	-	-
Natural Resources Preservation	P	P	P	P
Park Maintenance Facilities	P	P	-	-
Agriculture				
Agricultural Processing	P	P	P ²	-
Aquaculture Facilities	P	P	P	-
Dairies	P	P	P	-
Horticulture Nurseries & Greenhouses	P	P	P	-
Raising & Harvesting of Crops	P	P	P	-
Raising, Maintaining & Keeping of Animals	P	P	P	-
Separately Regulated Agriculture Uses				
Agricultural Equipment Repair Shops	P	P	P ²	-
Commercial Stables	P	P	P	-
Community Gardens	P	P	P	-
Equestrian Show & Exhibition Facilities	P	P	-	-
Open Air Markets for the Sale of Agriculture-Related Products & Flowers	P	P	-	-



**Table 132-15D
 Noise Compatibility Criteria for MCAS Miramar, Brown Field Municipal Airport,
 Montgomery-Gibbs Executive Airport, and NOLF Imperial Beach Airport Influence Areas**

San Diego Municipal Code
 (10-2024)

Chapter 13: Zones

Use Categories/ Subcategories [See Section 131.0112 for an explanation and descriptions of the Use Categories, Subcategories, and Separately Regulated Uses]	Aircraft Noise Exposure (dB CNEL)			
	60-65	65-70	70-75	75-80
Theaters that are outdoor or over 5,000 square feet in size	P	p ²	-	-
Urgent Care Facilities	P	p ²	p ²	-
Veterinary Clinics & Animal Hospitals	P	p ²	p ²	-
Zoological Parks	P	P	-	-
Offices				
Business & Professional	P	p ²	p ²	-
Government	P	p ²	p ²	-
Medical, Dental, & Health Practitioner	P	p ²	p ²	-
Regional & Corporate Headquarters	P	p ²	p ²	-
Separately Regulated Office Uses				
Real Estate Sales Offices & Model Homes	P	p ²	p ²	-
Sex Offender Treatment & Counseling	P	p ²	p ²	-
Vehicle & Vehicular Equipment Sales & Service				
Commercial Vehicle Repair & Maintenance	P	P	p ²	-
Commercial Vehicle Sales & Rentals	P	P	p ²	-
Personal Vehicle Repair & Maintenance	P	P	p ²	-
Personal Vehicle Sales & Rentals	P	P	p ²	-
Vehicle Equipment & Supplies Sales & Rentals	P	P	p ²	-
Separately Regulated Vehicle & Vehicular Equipment Sales & Service Uses				
Automobile Service Stations	P	P	p ²	-
Outdoor Storage & Display of New, Unregistered Motor Vehicles as a <i>Primary Use</i>	P	P	p ²	-
Wholesale, Distribution, Storage				



MCAS Miramar ALUCP Noise Compatibility Policies Criteria Table MIR-1

Land Use Category ¹	Exterior Noise Exposure (dB CNEq)					
	50-55	55-60	60-65	65-70	70-75	75-80
<i>Note: Multiple land use categories and compatibility criteria may apply to a project</i>						
Agricultural and Animal-Related						
nature preserves; wildlife preserves; horse stables; livestock breeding or farming		A	A	A	A	
zoos; animal shelters/kennels; interactive nature exhibits			A	A		
agriculture (except residences and livestock); greenhouses; fishing						A
Recreational						
children-oriented neighborhood parks; playgrounds			A			
campgrounds; recreational vehicle/motor home parks						
community parks; regional parks; golf courses; tennis courts; athletic fields; outdoor spectator sports; fairgrounds; water recreation facilities				A		
recreation buildings; gymnasiums; club houses; athletic clubs; dance studios				50	50	
Public						
outdoor amphitheatres		A	A			
children's schools (K-12); day care centers (>14 children)			45			
libraries			45			
auditoriums; concert halls; indoor arenas; places of wor- ship			45	45		
adult schools; colleges; universities ²			45	45		
prisons; reformatories				50		
public safety facilities (e.g., police, fire stations)				50	50	
cemeteries; cemetery chapels; mortuaries				45	45	
Residential, Lodging, and Care						
residential (including single-family, multi-family, and mo- bile homes); family day care homes (≤14 children)			45			
extended-stay hotels; retirement homes; assisted living; hospitals; nursing homes; intermediate care facilities			45			
hotels; motels; other transient lodging ³			45	45		
Commercial and Industrial						
office buildings; medical clinics; clinical laboratories; radio, television, recording studios				50	50	
retail sales; eating/drinking establishments; movie theaters; personal services				50	50	
wholesale sales; warehouses; mini/other indoor storage					50	50
industrial; manufacturing; research & development; auto, marine, other sales & repair services; car washes; gas stations; trucking, transportation terminals					C	C
extractive industry; utilities; road, rail rights-of-way; outdoor storage; public works yards; automobile parking; automobile dismantling; solid waste facilities					50	C

See next page for interpretation/Comments on above evaluations

Table MIR-1

Noise Compatibility Criteria MCAS Miramar



Land Use Acceptability		Interpretation/Comments
	Compatible	<i>Indoor Use:</i> Standard construction methods will sufficiently attenuate exterior noise to an acceptable indoor community noise equivalent level (CNEL) <i>Outdoor Use:</i> Activities associated with the land use may be carried out with essentially no interference from aircraft noise
45 50	Conditional	<i>Indoor Use:</i> Building must be capable of attenuating exterior noise to the indoor CNEL indicated by the number; standard construction methods will normally suffice <i>Outdoor Use:</i> CNEL is acceptable for outdoor activities, although some noise interference may occur.
A B C	Conditional	<i>Indoor or Outdoor Use:</i> A Caution should be exercised with regard to noise-sensitive outdoor uses; these uses are likely to be disrupted by aircraft noise events; acceptability is dependent upon characteristics of the specific use ⁴ B Outdoor dining or gathering places incompatible above CNEL 70 dB C Sound attenuation must be provided for associated office, retail, and other noise-sensitive indoor spaces sufficient to reduce exterior noise to an interior maximum of CNEL 50 dB
	Incompatible	<i>Indoor Use:</i> Unacceptable noise interference if windows are open; at exposures above 65 dB CNEL, extensive mitigation techniques required to make the indoor environment acceptable for performance of activities <i>Outdoor Use:</i> Severe noise interference makes outdoor activities unacceptable

Notes

- ¹ Land uses not specifically listed shall be evaluated using the criteria for similar uses.
- ² Applies only to classrooms, offices, and related indoor uses. Laboratory facilities, gymnasiums, outdoor athletic facilities, and other uses to be evaluated as indicated for those land use categories.
- ³ Hotels and motels are lodging intended for stays by an individual person of no more than 30 days consecutively and no more than 90 days total per year; facilities for longer stays are in extended-stay hotels category.
- ⁴ Noise-sensitive land uses are ones for which the associated primary activities, whether indoor or outdoor, are susceptible to disruption by loud noise events. The most common types of noise-sensitive land uses include, but are not limited to, the following: residences, hospitals, nursing facilities, intermediate care facilities, educational facilities, libraries, museums, concert halls, places of worship, child-care facilities, and certain types of passive recreational parks and open space.





February 17, 2026

City of San Diego Planning Commission
7650 Mission Valley Rd
San Diego, CA 92108

RE: 2026 Land Development Code Update

Dear Chair Moden and Planning Commissioners,

On behalf of the undersigned coalition of stakeholders, we respectfully submit the below comments to the Planning Commission on the proposed items in the 2026 Land Development Code Update (LDC Update). Our coalition's members represent thousands of businesses and hundreds of thousands of employees in the City of San Diego. As such, we have a keen interest in regulatory changes that allow businesses to thrive, incentivize the construction of housing for our region's workforce, and make zoning adjustments that accommodate the evolving needs of our region, both for residential and commercial development. We deeply appreciate our ongoing partnership with the City's Planning Department to work together towards these goals. Below we highlight the specific items in the LDC Update that are priorities for our coalition and have divided them into three sections: items we currently support, items we currently oppose, and items we are reviewing and would support if amendments are made.

IN SUPPORT OF:

[#6: Complete Communities Housing Solutions- For-Sale Dwelling Units](#)

- This amendment is a welcome change that provides flexibility for new types of homes to be included in the CCHS program.

[#10: Old Town San Diego Planned District- Sidewalk Cafes](#)

- This amendment helps support the development of sidewalk cafes and active sidewalks in the Old Town Planned District, enhancing economic activity and allowing for business expansion.
- This also codifies operations that are currently occurring under extended COVID-19 pandemic sidewalk café regulations.

[#85: Appeal Fees: Project and Environmental Appeals](#)

- This would increase the appeal fee for project and environmental appeals, which will help prevent frivolous appeals.

#89: Public Right-of-Way Permits- Fiber Optic and Utility Equipment

- This provides streamlined installation of larger equipment cabinets in the right-of-way, eliminating unnecessary delays and allowing for the modernization of wireless equipment.

#93: Airport Land Use Compatibility Overlay Zone- Safety Compatibility for Child Care Centers in the Marine Corps Air Station (MCAS) Miramar Airport Influence Area Transition Zone

- This is a needed change to allow child-care centers near MCAS Miramar, providing child-care opportunities for an important segment of our City's workforce.

#94: Wireless Communication Facilities Regulations

- This would eliminate the need for Planning Commission approval for certain wireless communication facility applications.

#97 Promenades and Active Sidewalks - Relocating Accessible Parking Spaces

- This amendment encourages the development of sidewalk cafes and active promenades while maintaining accessible parking spaces within the same block.

#100 Encroachment Maintenance and Removal Agreements - Sidewalk Alternative Designs

- This amendment permits staff to remove an entitlement barrier, further encouraging applicants to develop and activate community sidewalks.

#103: Carmel Valley Planned District- Medical Offices

- This allows for medical offices in the Employment Center zone of Carmel Valley, expanding opportunities for medical services and bolstering an important sector of the City's economy.

#2: Downtown: Permit Process for Development within the Coastal Zone Overlay

- Helps streamline review of Downtown development within the Coastal Zone by reducing process level for certain sites from Process 2 to Process 1.

#5: Downtown: Increasing Homeownership Opportunities

- This is an example of incentivizing development to include for-sale housing by creating a new density bonus.

#6: Downtown: Small Lot Development Incentive

- This incentivizes development of smaller lots by creating a new density bonus and exemptions from certain development regulations.

#7: Downtown: Increasing Middle Income Housing

- This incentivizes the development of 100% middle-income housing Downtown via adjusting the existing Middle Income Housing density bonus.

#8: Downtown: C Street Revitalization Bonus

- Encourages development along underutilized C Street properties with an additional bonus of 100% of the FAR earned through other FAR bonus programs; this can help revitalize the C Street corridor by increasing housing supply or new commercial development.

#22: Downtown: Downtown Community Plan Minor Amendments

- Aligns the Downtown Community Plan with previously adopted Centre City and Gaslamp Quarter ordinance updates while removing outdated redevelopment and CCDC references and obsolete materials to reflect the current planning framework.

#27: Downtown: Outdoor Activities

- Allowing outdoor activities by right makes it easier for businesses to activate spaces, driving foot traffic and increasing customer spending. Maintaining Temporary Use Permit requirements for live entertainment preserves oversight while still supporting flexible placemaking that strengthens Downtown's economy.

IN OPPOSITION TO:

We respectfully request that these items be removed from this year's Land Development Code Update.

#7: Complete Communities Housing Solutions- Development Impact Fee Waivers

- This amendment increases development costs by removing a DIF waiver for units under 500 square feet.
- Removing a DIF waiver for small units will not itself incentivize larger units to be built, it will simply make projects more costly and increase costs for tenants.
- Our coalition has joined the Building Industry Association in the submission of a compromise proposal that would preserve certain DIF waivers in this category while being mindful of the City's current budgetary situation.

#9: Central Urbanized Planned District- Moving and Storage Facilities

- This amendment bans new moving and storage uses in a couple of specific corridors, partially on the basis of a future community plan update that is still in development.
- This policy sets a bad precedent, eliminating a specific business use from an area of the City with limited rationale.
- Moving and storage uses are essential assets to many residents and businesses who do not have the storage space necessary for their belongings or business supplies. Banning them in certain areas of the city creates hardship for residents and businesses alike by forcing long distances to access these storage facilities, as well as increasing the number of vehicle miles traveled to access these important facilities. We believe this item should be removed from the update.

#91: Residential, Commercial, and Mixed Use Base Zones- Building Transitions and Buffers from Adjacent Freeways

- Adds Citywide angled transition plane requirements.
- This will eliminate developable land and reduce the amount of new housing in important areas of the City.
- We believe this should be reconsidered and brought back at a subsequent update after consultation with builders and designers.

#31: Downtown: Limiting Reductions in Sidewalk Area for Vehicle Loading

- Prohibits curb line movement for the creation of passenger loading areas, which could prevent new projects from having loading zones.
- Passenger loading is important to both residents and businesses. Not having enough loading zones results in dangerous situations for people accessing ride share, and also for the delivery of goods. In areas of the city where there is insufficient loading zones, you already see double parking which creates traffic conflict and safety issues.
- This should be further considered in a subsequent update.

SUPPORT IF AMENDED:

#17: Setback Requirements-Fire Separation Distance

- This is an amendment to Residential Base Zone regulations to clarify that the fire code may require a greater setback in certain cases for health and safety purposes.
- Does this align with state law or go further?
- If further, why is this needed when numerous examples exist of safely accessible areas without this additional setback requirement?

#29: Complete Communities Housing Solutions - Offsite Requirements

- This amendment narrows the ability for market rate units to create offsite affordable units, even though the current program has shown overwhelming success at creating both market rate and affordable housing.
- We appreciate Staff's decision to extend the 12-month timeframe, however, additional flexibility is still needed given current market conditions

#39: Tentative Maps: When a Tentative Map is Not Required

- This item is intended to bring conformance with state law that allows tentative map exemptions for projects on commercial and industrial base zones.
- The language is unclear as it relates to the EMX base zone.
- We would request clarification that for the purposes of this change, the EMX zone would still qualify for a tentative map exemption.

#68: MCAS Miramar Airport Land Use Compatibility Plan Consistency with Land Development Code

- Attempts to bring into conformance the allowed uses in the MCAS Miramar ALUCP and that of Table 132.14D.
- It appears one use was not delineated in the language included in the amendments under Item #68 that is conditionally allowed in the MCAS Miramar ALUCP.
- Specifically, Vehicle & Vehicular Equipment Sales & Services should be added to Table 132-15D which would make it consistent with Table MIR-1 of the MCAS Miramar ALUCP.
- There are no other conflicts given the limited applicability of this in that area, where no residences are allowed.

#87: Previously Conforming Use Flexibility

- We appreciate staff's efforts to recognize difficult economic times and the need to allow existing tenants to continue in spaces they occupy.
- We also appreciate staff's recognition that community plan update changes may not reflect practical market conditions for numerous properties with long-standing existing uses.
- We would recommend, though, that the timeframe for allowing these previously conforming uses be extended beyond the proposed 15 years.
- We would also request that the proposal be extended to certain RM zones.

#109: Energy Efficient Pool and Spa Heating Systems

- How does this interact with or how is this affected by County of San Diego pool and spa heating regulations?

- Is there cost effectiveness data on this regulation? Some electric pool heating technology is not commercially viable yet.

#30: Downtown: Traffic Calming at Garage Entrances

- Requires installation of speed-reducing measures on sloped driveways at parking garage exits.
- Is this technically feasible? Does this apply to all garages or just new projects?

Again, many thanks to staff for their efforts and to the Commission for their consideration of our feedback on the 2026 Land Development Code Update. Should you have any questions, please do not hesitate to contact us by email.

Sincerely,



Chris Cate
President & CEO
San Diego Regional Chamber of Commerce



Craig Benedetto
Legislative Advocate
NAIOP San Diego



Chris Duggan
Director, Local Government Affairs
California Restaurant Association



Aimee Faucett
President and CEO
Building Industry Association of San Diego County



Molly Kirkland
Director of Public Affairs
Southern California Rental Housing Association



Justine Murray
Vice President of Government Affairs
Downtown San Diego Partnership



Melanie Woods
Vice President, Local Government Affairs
California Apartment Association



San Diego Land Lawyers

Real Estate • Land Use • Environmental

February 18, 2026

VIA ELECTRONIC MAIL

Planning Commission
City of San Diego
7650 Mission Valley Road
San Diego, CA 92108
planningcommission@sandiego.gov

Re: Hearing February 19, 2026 - Agenda Item #1 - 2026 Land Development Code Update Reform Item #103 (Carmel Valley Employment Center)

Honorable Chair and Members of the Planning Commission:

I write on behalf of Scripps Health regarding Reform Item #103 in the 2026 Land Development Code Update, which is currently before the Planning Commission.

Scripps became aware of this proposed amendment late last week. As a long-standing property owner in the Carmel Valley Employment Center, Scripps recognizes the importance of thoughtful land-use planning in this area and values the opportunity to participate in discussions that affect the Employment Center.

At this time, Scripps is not taking a position for or against the proposal. Rather, we have not yet had sufficient time to fully review and consider the amendment and its potential implications for properties in the Employment Center.

Accordingly, we respectfully request a brief continuance of approximately 30 days to allow adequate time for review and thoughtful consideration. Scripps looks forward to constructive engagement with the city planning staff during that period.

Thank you for your consideration.

Respectfully submitted,

Robin Madaffer, Esq.

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San Diego, CA 92101

Robin Madaffer, Esq.
(619) 239-7600
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San Diego Community Planners Committee

City Planning Department • City of San Diego • 202 C Street, MS 413 San Diego, CA 92101
SDPlanningGroups@sandiego.gov • (619)-235-5200

MEMO

TO: City of San Diego Planning

FROM: Victoria LaBruzzo, CPC Chair

DATE: January 27, 2026

RE: Community Planners' Committee (CPC) Comments on 2025 LDC Update

MOTION to adopt the subcommittee recommendations as presented at the February 27, 2026 CPC regular meeting. Furthermore, CPC urges the city to publish remaining code language as soon as possible to inform the public. Motion: Peninsula Second: North Park

A) CPC DOES NOT OPPOSE (as written)

CPC does not oppose Items 1–9, 11, 13–~~54~~, 26–~~289~~, 31–35, 39, 42–53, 55–57, 59–60, 62–84, 86–88, 90, 94–100, and 105–107, AND those portions of Item 61 which pertain to the Central Urbanized Planned District (CU PDO).

B) CPC DOES NOT OPPOSE IF MODIFIED (amendments requested)

*CPC does not oppose **Items 38 and 54** provided the City incorporates the amendments below:*

Item #38 – Pedestrian Path of Travel Parameters

*State law did not specify parameters for a pedestrian path of travel. CPC recommends applying an already adopted standard from the City's Street Planning Manual—specifically the bicycle design standard—to provide clear, objective criteria for implementation. Using this established City Design Manual standard ensures consistent treatment of factors such as **grade steepness** and supports accessible pedestrian movement to and from shared parking areas for all users, including **older adults and individuals with disabilities**.*

Item #54 – Incentives Waivers Report (IWR)

State law allows for an “Incentives Waivers Report,” and CPC recommends that the City create a simple, standardized version of this report for applicants to complete at the outset of a project. Establishing a uniform form and terminology will prevent applicants and members of the public from searching for a report that is not otherwise required and will ensure consistent documentation across projects. CPC further recommends that the City include a dedicated, searchable database field for this report so staff and the public can efficiently retrieve, compile, and analyze waiver-related information now and in the future.

C) CPC OPPOSES (non-state-mandated)

CPC opposes Items 30, 85, 89, 91, 92, and 93, 102 and requests the City revise these items as reflected in the requested amendments below.

Item #85 – Appeal Fees

CPC recommends that All CPG appeals fees to be waived.

Item #89 – Oppose changing to Process 1. The change to Process 2 would allow for public comment and aligns with the work done by the Utility Undergrounding Advisory Committee adopted by City Council.

Item #91 – Transition Planes and Buffers from Adjacent Freeways

The proposed code change would set the transition plane angle to 65 degrees between commercial development abutting adjacent residences of 15 DU/AC or fewer or an open space zone (OC, OP, OC). CPC recommends a 45-degree transition plane angle, particularly to minimize development impacts adjacent to parks and open space.

Items #92 and #93 – Transition Zone (TZ) adjacency to Miramar APZ

CPC references language from the adopted University Community Plan (2024) which states:

“The University Community also has land categorized as Accident Potential Zone (APZ) I and II and Transition Zone (TZ)...where there is greatest potential for accidents.”

Item #92 – Housing up to 60 DU/AC in Transition Zone (TZ)

Housing up to 60 DU/AC is currently allowed in the Transition Zone (TZ) with an SDP. Code amendment #92 would eliminate the SDP and replace it with a ministerial decision. CPC recommends an SDP continue to be required due to adjacency to the Miramar Airport Accident Potential Zone (APZ).

Item #93 – Child Care facilities in Transition Zone (TZ)

Childcare facilities are currently disallowed in the Transition Zone (TZ). The proposed amendment would allow childcare with a ministerial decision. CPC recommends childcare not be disallowed, but that an SDP be required due to adjacency to the Miramar Airport Accident Potential Zone (APZ).

Item #102 - Mobility Choice Regulations – VMT Reduction Measures Buy-Out Fee – Mobility Zones 2 and 3

This update would create negative impacts for multiple communities—primarily, though not exclusively, within District 5—by reducing the requirement for onsite VMT Reduction Measures in Mobility Zones 2 and 3. Many neighborhoods in these districts have limited access to major transit centers due to distance, roadway constraints, and significant changes in topography, making localized VMT mitigation especially critical. Despite these conditions, the update would instead allow developers to pay the VMT Reduction Measure Buyout Fee, permitting the City to allocate those funds elsewhere rather than applying them within the communities where the transportation impacts are actually occurring.

D) CPC OPPOSES (state-mandated items, noted)

CPC opposes Items 36, 37, 40, 41, and 58, while recognizing these amendments are mandated by state law, and requests the City provide clarity on statutory basis and implementation impacts.

E) NO CPC ACTION / NO MOTION

CPC takes no action on Items 10, 101, 103, and 104, AND those portions of Item 61 which apply to the Cass Street Planned District (PB PDO) and the Carmel Valley Planned District (CV PDO).

F) OUTSTANDING ITEMS (Needs further information from Planning): 12, ~~29-25~~, ~~89~~ Tabled until February board meeting.

VOTE RECORD

Vote: 22 Yes / 0 No / 0 Abstain

Community Planners Committee

2026 LDC UPDATE

David Moty, Chris Nielsen, &

CPC Chair Victoria LaBruzzo

CPC Positions

Switches to ...

Support #25 and Oppose #29

Opposes #38

Opposes #54

Opposes #89 & 94

Utility Undergrounding Advisory Committee

Report and Recommendations

March 23, 2015



Committee Members:

1. Joe LaCava, Chair (D1)
2. Ignacio De La Torre, AT&T
3. Ileana Engel, Cox Communications¹
4. Joe Gabaldon, Time Warner Cable
5. Vicki Granowitz, North Park (D3)
6. Tom Hebrank, Kensington(D9)
7. Bobby Johnson(D8)
8. Breandan Lee, AT&T
9. David Moty, Talmadge (D9)
10. John Ready, Mission Beach (D2)
11. Don Taylor, Kensington (D9)
12. Ian Stewart, SDG&E
13. Kathy Valdivia, SDG&E

Utility company representatives were assisted by:

Christine Moore, AT&T

Chuck Baker, Cox Communications

Joe Michael Shaffer, Cox Communications

Joe DeCarli, Cox Communications

Jonathan Woldemariam, SDG&E

Rick Gardner, SDG&E

Tom Scanlan, Time Warner Cable

Randall Starkey, Time Warner Cable

Ray Harns, Time Warner Cable

Council Offices Staffing the Committee:

Molly Chase, Council District 3

Ralph Dimarucut, Council District 9

City Staff, Utilities Undergrounding Program:

Hasan Yousef

Mario Reyes

CPC Positions

Opposes #91

Opposes #92

Opposes #93