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February 24, 2026

Heidi Vonblum  
City Planning Director  
City Planning Department  
202 C Street  
San Diego, CA 92101

**SUBJECT: Neighborhood Homes for All of Us Program and Feasibility Study Priorities**

Dear Director Vonblum:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to make recommendations to inform the City's Neighborhood Homes for All of Us program and feasibility study.

**1. Circulate strongly supports the City's efforts to create opportunities for affordable, missing middle homes.**

Circulate strongly supports the City's initiative to allow new missing middle homes in San Diego. San Diego is short 90,000 homes<sup>1</sup>, and it's critical that the City examines all options that could lead to more for-sale and rental units. This program has the potential to create new opportunities for people and families across the City. To have the greatest impact on the housing affordability crisis that families face, the program must be designed to serve all household types across the City.

**2. The more flexible the program, the more families will benefit.**

A program that intends to create affordable homes must keep in mind that families and households do not look one certain way. Families have different makeups, sizes, budgets, and needs. A program designed to create homes for families must be flexible enough to ensure that a family seeking a one-bedroom home in a suburban area near school and a family seeking a three-bedroom home near transit will both benefit.

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<sup>1</sup> Andrew Keats, "San Diego's Housing Shortage Explained in One Chart", Axios, January 9, 2024, available at <https://www.axios.com/local/san-diego/2024/01/09/san-diego-housing-shortage-chart>.

### **3. The City should avoid the pitfalls of snob zoning.**

There is a long and shameful history of “snob zoning” land use restrictions which require certain expensive amenities, and in practice economically exclude families from living in high opportunity areas.<sup>2</sup> Clearly the City’s intent is to remedy this history, yet it should take care not to recreate the same mechanisms of exclusion.

Local mandates described as amenities can have exclusionary impacts. For example, the California Department of Housing and Community Development identifies minimum unit sizes and parking requirements, family definitions, and occupancy requirements as common barriers to affirmatively furthering fair housing.<sup>3</sup>

To best achieve the program’s stated goal of creating more homes for families, the design standards outlined under this program must be flexible and non-prescriptive. Standards like minimum bedroom counts, minimum lot sizes, and parking requirements, will ultimately exclude certain types of families that this program could serve.

### **4. The City should seek to maximize the number of qualifying properties.**

Initial program documents suggest that the City is considering limiting this program to areas near transit. While transit proximity may be an appropriate policy choice for some housing programs, this program is seeking to construct new homes in single family neighborhoods, which in general are less transit-connected. Limiting eligible lots to transit proximity areas would undermine the intent of this program.

Additionally, this program should avoid any vacancy requirements. The Starter Home Revitalization Act (SB 1123) requires ministerial approval for maps for infill developments of this nature. This law is limited to vacant lots. As the City considers this similar local program, it should not adopt this requirement.

### **5. Committing to ambitious timelines means more homes for families more quickly.**

Circulate recommends that the City require applications under this program be approved ministerially in under 60 days. The City of Los Angeles adopted a 60-day deadline for its similar infill housing program.<sup>4</sup>

### **6. A feasibility study must incorporate these points to examine how to best serve San Diego families.**

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<sup>2</sup> “Author Richard Kahlenberg takes on ‘snob zoning’ and NIMBYism in his book, “Excluded,” Street Sense Media, August 28, 2024, available at <https://streetsensemedia.org/article/author-richard-kahlenberg-takes-on-snob-zoning-and-nimbyism-in-his-book-excluded>.

<sup>3</sup> Affirmatively Furthering Fair Housing: Guidance for All Public Entities and for Housing Elements, California Department of Housing and Community Development (April 2021 Update), page 26, available at [https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf).

<sup>4</sup> Los Angeles City Planning, Starter Homes Revitalization Act website, available at <https://planning.lacity.gov/project-review/shra-senate-bill-684-1123>, last visited January 22, 2026

As the City moves forward with a feasibility study to inform this program, Circulate urges the City to run an economic scenario analysis on the following factors. Specifically, the study should consider how imposing these requirements may affect development feasibility, rent prices, and overall unit production. The analysis should consider:

- Minimum bedroom requirements
- Minimum unit sizes
- Parking minimums
  - In addition to minimizing parking requirements, the City should look into how relief from certain current parking dimension standards may enable more innovative unit design under this program.
- Transit proximity requirements
- Inclusionary requirements

Please do not hesitate to reach out with questions or clarifications.

Sincerely,



Aria Grossman  
Policy Manager  
Circulate San Diego

Cc  
Mayor Todd Gloria  
San Diego Regional Policy and Innovation Center