THE CITY OF SAN DIEGO

Report to the Planning Commission

DATE ISSUED: November 12, 2026 REPORT NO. PC-26-034

HEARING DATE: November 19, 2026

SUBJECT: Mid-City Communities Plan Update Workshop III

REFERENCES: January 9, 2025 - Mid-City Communities Plan Update Workshop, Report No. PC-25-003

March 19, 2026 – Mid-City Communities Plan Update Workshop II, Report No. PC-26-007

SUMMARY

This is the third workshop for the Planning Commission to provide input on the Mid-City Communities Plan Update. No action is required on the part of the Planning Commission at this time. The update establishes a long-term framework for housing, economic development, mobility, parks, public facilities and infrastructure, consistent with the City's General Plan and Climate Action Plan. This workshop is intended to serve as an opportunity for the Planning Commission to provide input on the first draft of the Mid-City Communities Plan (Attachment 1). The updated Communities Plan provides additional capacity for homes and mixed-use development along transit corridors, such as El Cajon Boulevard, University Avenue, Adams Avenue, and Fairmount Avenue, with transitioning densities between the transit corridors and surrounding neighborhoods. Previous workshops were held with the Planning Commission on January 9, 2025, to review existing conditions, and March 19, 2026, to gather input on the Mid-City Ideas Report. Building on those discussions, staff is seeking input on the first draft of the Mid-City Communities Plan, including the proposed supporting mobility and public space improvements, and recommendations for refining the Draft Communities Plan. Staff anticipates releasing the Second Draft in Spring 2027, which would include revisions in response to community feedback and additional technical analysis, followed by public hearings.

BACKGROUND

The Mid-City Communities Plan was last updated in 1998. The City launched the update in December 2023. The update provides an opportunity to establish a coordinated vision for Mid-City for the next 30 years consistent with the General Plan. Since 1998, the City adopted a new General Plan in 2008, amending it in 2024 (Blueprint SD), and adopted an updated Climate Action Plan in 2022. Since 2014, the City has comprehensively updated 16 community plans to align with the General Plan. Housing needs, transportation priorities and approaches to planning for parks, public spaces and infrastructure have also evolved. The update considers citywide policy for homes, jobs, mobility, climate and equity by identifying opportunities for new homes and businesses, together with improvements to mobility, parks, public facilities and infrastructure, to meet the existing and future needs for people living, working and visiting Mid-City's four communities.

Location

The Mid-City Communities Plan covers 8,052 acres and includes four communities: City Heights, Eastern Area, Kensington-Talmage and Normal Heights. The northern area of Mid-City borders Interstate 8 and the College Area community, while the west borders Interstate 805, State Route 15, and the North Park and Greater Golden Hill communities. The east side borders the City of La Mesa, and the southern portion is bounded by State Route 94 and the communities of Southeastern and Encanto Neighborhoods. There are 24 neighborhoods within the four Mid-City communities, as shown on Attachment 2.

History

Mid-City includes some of the City's oldest communities. Much of the community's western portion saw rapid growth in the 1910-1930 era with the expansion of the streetcar network along Adams Avenue and University Avenue, before the Second World War, while development east of 54th Street generally occurred in the post-World War II period as more people traveled by car. Overall, residential development is a mix of single-family and multi-family homes, with pockets of varying multi-family densities ranging from duplex development to early-century apartment courts, garden apartments, and higher-density residential and mixed-use development. Commercial and business development has historically been concentrated along the three major east-west corridors: El Cajon Boulevard, Adams Avenue and University Avenue.

Housing & Demographics

In 2025, Mid-City had approximately 137,504 people and 53,452 homes, while its businesses employed over 22,932 people. A comprehensive overview of existing conditions in Mid-City is provided in the Mid-City Atlas: Existing Conditions Report.

Population

As of 2025, the San Diego Association of Governments (SANDAG) estimated that 137,504 people were living within Mid-City. Table 1 shows there was a 2 percent decrease from the 140,044 people living in the community in 2010, based on SANDAG estimates, compared to an 8 percent increase citywide.

Housing

In 2025, the community had approximately 53,452 homes. Table 1 also shows that between 2010 and 2025, the community added 1,700 homes, a 3 percent increase from the 51,752 homes in 2010. The community had a rate of 2.5 persons per household in 2025, compared with 2.61 in 2010. This aligns with citywide trends, where San Diego had a rate of 2.52 persons per household in 2025, compared with 2.6 in 2010.

Income

In 2025, the median household income was approximately $88,753, lower than the $112,660 citywide. Table 1 shows there was a 100 percent increase from the $44,331 median household income in 2010 based on SANDAG estimates, compared to a 45 percent increase citywide.

Table 1. Mid-City Population, Housing and Income Trends, 2010-2025

Year	Households Population	Homes	Persons per Household	Income
2010	140,044	51,752	2.61	$44,331
2025	137,504	53,452	2.50	$88,753
Change	**-2%**	**3%**	**-4%**	**100%**

Source: SANDAG Population & Housing Estimates Jan. 2025; SANDAG: Census 2010 Profile

Affordable Housing

According to San Diego Housing Commission data from June 2026, there are currently 3,406 deed-restricted affordable homes in Mid-City, which is 6.37 percent of Mid-City's total number of homes today, compared to 5 percent citywide. City Heights has the greatest number of affordable homes with 2,148, which is 63 percent of the total number. City Heights makes up 40 percent of total area across the community. These figures do not capture naturally occurring affordable housing, which also exists within the community.

Table 2. Mid-City Communities: Deed-Restricted Affordable Homes - Existing

Community Plan Area	Deed-Restricted Affordable Homes	Percent of Total Affordable Homes	Percent of Land Area
City Heights	2,148	63%	40%
Eastern Area	716	21%	43%
Kensington-Talmadge	395	12%	16%
Normal Heights	147	4%	1%
Total	**3,406**	**100%**	**100%**

Source: San Diego Housing Commission, June 2026

DISCUSSION

How are the awarded grant funds being used to support the Communities Plan Update?

The City was awarded two grants from SANDAG and one grant from Caltrans to support the Mid-City Communities Plan Update process for preparing the draft plan and the community engagement:

- Smart Growth Incentive Program Grant from SANDAG supported the Phase 1 public engagement, existing conditions analyses, and development of preliminary concepts.
- Regional Early Action Program 2.0 Housing Acceleration Grant from SANDAG supports the *Draft Ideas Report*, urban design concepts, technical studies and the draft Mid-City Communities Plan.
- Sustainable Transportation Program Grant from Caltrans supports the development of technical studies, proposed mobility networks and multi-modal concepts, and associated public engagement activities.

What are the vision and key objectives of the Communities Plan Update?

The City is updating the Mid-City Communities Plan to identify opportunities for new homes, businesses and infrastructure. The updated Communities Plan is consistent with the General Plan's City of Villages strategy and Climate Action Plan by further addressing the following key objectives, as well as others that arise through the update process:

- Increasing opportunities for additional residential and employment land uses within walking distance to transit stops;
  - Revitalize major activity centers as walkable destinations;
  - Identify appropriate locations to support a diversity of employment and mixed-use land uses;
  - Address the City's climate goals by locating homes and jobs near each other, transit, and other everyday amenities;
- Strengthening Mid-City's commercial corridors and employment areas;
- Improving walking, biking, and transit connections to homes, jobs, and amenities;
- Preserving open space canyon areas; and
- Addressing public facilities, parks and recreation, and infrastructure needs.

What type of community engagement has been conducted during the Update process?

So far, City staff has received over 10,200 comments from more than 3,300 people over 126 events, including online and in-person surveys, workshops, open houses, office hours, pop-up events, focus groups, youth engagement activities, working group and community planning group meetings in each of the four Mid-City communities since the start of the Update process. Community feedback highlights differing priorities regarding the location and intensity of additional housing, corridor design, parking, and the timing of infrastructure and public improvements, among other issues. The Phase One Public Engagement Summary provides a comprehensive overview of feedback heard during public engagement in Mid-City and informed the development of the Mid-City Ideas Report. The Phase Two Public Engagement Summary informed the development of the first draft of the Mid-City Communities Plan update.

What type of feedback has staff received regarding the Draft Communities Plan?

Since the release of the first draft of the Mid-City Communities Plan on August 7, 2026, staff has received over 1,500 comments, 26 letters, and 376 postcards that generally focus on concerns about the proposed density, recreational needs, community character, urban canopy and greening, mobility needs, infrastructure needs, fire safety, emergency evacuations, economic development, preservation of historic neighborhoods, anti-displacement protections for residents and small businesses and multi-modal and transit improvements. There are also differing views on the amount and location of additional capacity for homes, and the design of mobility improvements. City staff is still analyzing community feedback; however, a preliminary high-level summary is provided in Attachment 3 and a complete overview is provided in Attachment 4. Staff will consider these alongside technical analysis and citywide policies when refining the Second Draft, which is anticipated to be released in early 2027.

How does the Draft Communities Plan align with the City of Villages Land Use Strategy and the Climate Action Plan?

The General Plan's Village Climate Goal Propensity Map identifies climate-smart village areas where additional homes and jobs are most likely to increase the share of trips made by transit, walking, and bicycling. The Mid-City communities contain some of the highest residential and mixed-use propensity areas in the city, as shown in Attachment 5. This means that these areas are some of the areas in the City where it is mostly likely that people will get around without a car, or when driving, be able to drive less. The Draft Communities Plan builds on these opportunities by promoting transit villages along

major corridors, with additional capacity for homes, jobs, and public spaces near high-frequency transit routes and bicycle networks to help advance the City's climate goals.

How does the Draft Communities Plan land use increase opportunities for homes and jobs?

The planned land uses align with the goals of the General Plan's climate smart village area, fair housing, and Transit Village Plan (Senate Bill 79), while minimizing changes in very high fire severity zones and flood zones. The land use map enhances Mid-City's vibrancy through additional opportunities for homes, jobs, public spaces, streetscape enhancements, and ground-floor commercial uses to create better-designed places for people, as shown on Attachment 6. While the overall land use pattern remains similar to the currently adopted plan, it increases density and intensity along transit corridors and neighborhoods, as shown in Table 3.

Table 3. Mid-City Communities Community Plan Land Use Designations

***Urban Village* – High-intensity mixed-use buildings with public spaces**	
Up to 218 du/ac	Along El Cajon Boulevard and Fairmount Avenue at major intersections and adjacent to Teralta Park
***Community Village* - mixed-use development with housing, commercial and civic uses**	
Up to 145 du/ac	University Avenue, at College Grove Shopping Center, at El Cajon Boulevard and College Avenue, and at Federal Boulevard and Euclid Avenue.
***Community Commercial* – commercial and civic uses and homes as part of mixed-use development**	
Up to 218 du/ac	Along El Cajon Boulevard
Up to 109 du/ac **Up to 73 du/ac** **Up to 44 du/ac**	Along University Avenue and Adams Avenue Along portions of Fairmount Avenue and Euclid Avenue Along Poplar Street
***Residential* - homes and limited neighborhood-serving retail as part of mixed-use development**	
146 to 218 du/ac	Along Fairmount Avenue
74 to 109 du/ac	Along El Cajon Boulevard and Fairmount Avenue
45 to 73 du/ac	Along University Avenue and Adams Avenue
45 to 54 du/ac **30 to 44 du/ac** **16 to 29 du/ac**	Neighborhoods between Adams Avenue and El Cajon Boulevard South of Landis and along Fairmount Avenue North of Monroe Avenue

What's the capacity for homes proposed in the Draft Communities Plan?

The proposed land use framework expands capacity for approximately 32,900 additional homes beyond the current adopted plan capacity as shown on Table 4, primarily along existing and planned bus rapid transit corridors such as El Cajon Boulevard, University Avenue, Adams Avenue, and Fairmount Avenue, following a similar land use pattern in the adopted Communities Plan. By expanding opportunities for homes in these areas, the Draft Communities Plan supports a broader range of housing types that meet the diverse needs of Mid-City's community members. **It is**

important to note that the update to the Mid-City Communities Plan does not require new development to occur. Rather, development would take place only as demand emerges and economic conditions make new projects feasible, and it does not represent proposed housing construction projects.

Table 4 Mid-City Planned Land Uses Estimated Home Capacity (Number of Homes)

	Adopted Community Plan	Proposed Community Plan	Difference
Total	**62,600**	**95,500**	**+32,900**

How does the Communities Plan Affirmatively Further Fair Housing?

The Draft Mid-City Communities Plan aims to increase opportunities for homes for people of all incomes and family types to live in and be part of a community that mostly has high- and higher-resource areas. The Draft Communities Plan would provide opportunities for a broad range of home types to accommodate various family types, household sizes and composition, homeownership and income levels. Approximately five percent of the Community Plan area is within either a high or highest resource opportunity area compared to 62 percent citywide as identified on the California Tax Credit Allocation Committee's 2026 Opportunity Area Map, as shown on Table 5 and Attachment 7.

The land use refinements in the Second Draft Communities Plan focus on providing additional opportunities for homes and jobs in areas with better access to transit and services, which aligns with the General Plan's goals for sustainable and equitable growth. The Community Plan provides a variety of residential densities to increase the number of possible home types, sizes, and affordability levels within all resource opportunity areas, particularly in areas with better access to transit and jobs.

Approximately 5 percent of Mid-City's land area is in a high resource area, located north of Adams Avenue in Normal Heights. The moderate resource area makes up about 25 percent of the Mid-City community, located in Normal Heights and Kensington-Talmadge. The low resource area makes up the largest amount of Mid-City by land area, at 70 percent, located in City Heights and Eastern Area. There is no highest resource area in Mid-City.

The Community Plan plans for mixed-use villages and corridors that are located primarily within the moderate opportunity areas. Development proposed in low resource areas is primarily located along University Avenue, at Federal Boulevard at Euclid Avenue, and at the College Grove shopping center. The Community Plan further develops and implements policies to support the General Plan's Housing Element goals and affirmatively furthers fair housing by encouraging new homes for people of all incomes with access to services, resources and jobs located near transit.

Table 5: 2026 Opportunity Areas – Mid-City Communities Plan Area and Citywide

Opportunity Area	Mid-City Communities	Citywide
Highest	0%	44%
High	5%	18%
Moderate	25%	10%
Low	70%	18%

Due to rounding, percentages do not precisely equal 100%.

How does the proposed land use comply with Senate Bill 79 (SB 79)?

The Draft Mid-City Communities Plan satisfies Senate Bill 79 (SB 79) by serving as a Transit-Oriented Development Alternative Plan. To meet SB 79's mandate of planning housing capacity within quarter- and half-mile radii of qualifying transit stops, which include three stops in Mid-City and several transit stops in adjacent communities that were identified by SANDAG, as shown in Attachment 8. The Draft Communities Plan incorporates SB 79 density requirements into the overall planned land use.

What are the main updates to urban design proposed by the Draft Communities Plan?

The Draft Communities Plan envisions buildings designed to enhance the pedestrian environment, with retail businesses along corridors within villages that are pedestrian-friendly, mixed-use and amenity-rich. The Draft Communities Plan also envisions wider parkways and sidewalks with street trees, lighting and public spaces that provide places for people to gather. The urban design framework illustrates the long-term vision for the areas anticipated to experience the greatest growth and are directly linked to the proposed land use pattern, as shown on Attachment 9. The framework also demonstrates how these areas are connected to existing and planned parks, open spaces, schools, community institutions, and other daily destinations through an integrated network of bicycle and pedestrian connections. Together, these elements support a connected and walkable community. There are 13 identified urban design study areas throughout Mid-City in transit villages, along transit corridors, and on main streets, which were developed based on community input. The study areas have more detailed urban design recommendations to support transit-oriented development. New development with residential uses within these study areas is envisioned to provide public spaces that can include recreational amenities, as shown in Attachment 10.

What are the main updates to mobility proposed by the Draft Communities Plan?

The Draft Communities Plan proposes a transportation network that prioritizes safe, accessible and efficient mobility for all users. This vision is achieved through a 'complete streets' approach, integrating buffered sidewalks with shade trees, separated and well-connected bikeways, and transit-priority measures that enhance connections to transit, parks, schools, homes and businesses. this approach supports the safety and comfort for people walking and riding bicycles, encouraging more people to walk, roll, bike or take transit, which can increase foot traffic and support local businesses.

The Draft Communities Plan proposes an expanded network of Class IV separated bikeways, or cycle tracks, along College Avenue, College Grove Drive, Fairmount Avenue, Federal Boulevard, Home Avenue, 43rd Street and 54th Street, and portions of Euclid Avenue and University Avenue, as shown on Attachment 11. An extension of the existing shared bus-bike lane on El Cajon Boulevard is proposed from Fairmount Avenue to east City limits to align with the College Area Community Plan. Class I multi-use paths are proposed along Aldine Drive, Chollas Parkway, and Federal Boulevard. The Community Plan update identifies Class II bike lanes and Class III enhanced bike routes to help facilitate internal connections within the community.

How does the Draft Communities Plan align with the Regional Plan?

The Draft Communities Plan incorporates the SANDAG 2025 Regional Plan's transportation network, as shown on Attachment 12. The Regional Plan proposes the addition of a new Trolley line through Mid-City between Mission Valley and Chula Vista, expanded Rapid bus routes, increased transit

frequency, and a microtransit service area. These investments align with the Draft Communities Plan's mobility goals by supporting sustainable growth, reducing reliance on driving and fostering safer, more connected streets. The Regional Plan identifies new Bus Rapid Transit along 54th Street, University Avenue, College Avenue, and Adams Avenue, enhancing connectivity between National City and San Diego State University, La Mesa and Ocean Beach, Downtown, and the University Community with stops in Mid-City. The Draft Communities Plan also supports transit priority measures (e.g., transit signals and queue jumps) and other transit amenities (e.g., shelters, seating and lighting).

How does the Draft Communities Plan Address Open Space and Conservation?

The Draft Communities Plan prioritizes sustainable development and resource conservation. The Communities Plan includes goals and policies to conserve natural resources, reduce non-renewable resource use and enhance climate resiliency. These strategies are designed to minimize the community's ecological footprint, reduce greenhouse gas emissions by reducing the amount of time people have to spend driving, and prepare for the effects of global climate change while supporting sustainable growth opportunities for homes and jobs. Approximately 786 acres of preserved open space are currently within the Multi-Habitat Planning Area in the Mid-City Communities Plan area, compared to 52,451 acres citywide. The City is also reviewing areas throughout the community to identify additional land for open space protection and corrections to open space boundaries. Proposed open space designations and boundary corrections will be included in the second draft of the Communities Plan to ensure that open space and sensitive habitat are accurately reflected and protected.

What kinds of parks and recreation spaces are proposed in the Draft Communities Plan?

The Draft Communities Plan identifies new opportunities for more than 46 parks, 10 miles of trails, and several recreational spaces, as shown in Attachment 13. Planned parks and facilities include South Chollas Lake Park, Chollas Triangle Neighborhood Park, expansion of Teralta Park through additional freeway lids over State Route 15, the Kensington Hillsides Loop Trail, and two tailhead pocket parks, enhancements to existing parks, new aquatic centers and recreation centers, and upgrades to existing recreation facilities. Additional recreational opportunities exist near trailheads in rights-of-way and vacant public land. The Draft Community Plan also identifies opportunities to expand recreational access through small and non-traditional spaces, such as excess rights-of-way and smaller undeveloped publicly-owned lots, as well as partnership and funding opportunities.

As part of the Communities Plan update, a Mid-City Park and Recreation Inventory was prepared, which provides both a community-wide recreation summary and a detailed, site-by-site inventory of enhancements to existing parks and new park opportunities. The inventory includes a description of each site, recommendations for potential recreation programs and amenities, and the existing and potential recreation value points for each site. In total, the inventory identifies 89 opportunities to enhance existing parks and open spaces and develop new parks and open spaces, which could provide approximately 5,672 additional recreation value points for the Mid-City Communities, with a total of up to 11,870 recreation value points.

Are public libraries' needs addressed in the Draft Communities Plan?

As the community continues to grow, the Draft Communities Plan identifies opportunities for new public libraries. A new Oak Park Library is currently under construction along College Grove Drive in the Eastern Area of Mid-City and is anticipated to open in 2028. The Community Plan also identifies the need for a future library to replace the Kensington-Normal Heights Library. The City is exploring opportunities to meet these needs on site via reconstruction, or elsewhere in the community, consistent with the City's Library Master Plan.

How does the First Draft address fire safety and emergency evacuations?

Fire Safety

Portions of the Mid-City communities are within a very high fire hazard severity zone due to proximity to canyons. The community is served by multiple fire stations in adjacent communities, including Fire Station 10 in Rolando, Fire Station 14 in North Park, Fire Station 17 in the Teralta East Neighborhood, Fire Station 18 in Normal Heights and Fire Station 26 in Oak Park. Additionally, two proposed fire stations in College Area and a potential fire station along Fairmount Avenue in City Heights would serve Mid-City. The Fire Department prepared a fire memorandum that evaluates the Mid-City Communities Plan Update, including potential impacts to Fire-Rescue services and resource needs associated with anticipated growth, as shown in Attachment 14.

A State Bill was introduced in 2019 and established requirements for local governments to identify residential areas with limited access in hazard areas. The City has prepared a draft to address these requirements as part of the proposed General Plan amendments which is currently available for public review. The Draft Mid-City Communities Plan proposed land use map does not propose increases in density within these areas, where a fire hazard is identified as shown in the proposed General Plan Amendments.

Emergency Evacuations

Community feedback during the Community Plan Update highlighted concerns regarding emergency evacuation. Evacuation considerations and fire hazard planning help to inform the communities' approach to future growth, however detailed procedures, agency responsibilities, and regional coordination are addressed through emergency plans and protocols that guide responses to specific emergencies. The City's Emergency Operations Plan, San Diego Police Department Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement identify which jurisdiction is responsible for an evacuation effort and how regional resources will be requested and coordinated. The City actively coordinates with the San Diego County Office of Emergency Services and participates in the Evacuation Working Group, a collaboration of public and private sector stakeholders from the region and the state.

The Police Department coordinates with other agencies to identify transportation and evacuation points for the relocation of people to safe areas during major disasters that would require emergency evacuation, depending on the specific hazard at the time. Evacuation routes may change depending on the major hazard. Major ground transportation corridors can provide primary evacuation routes during an evacuation effort. Primary evacuation routes consist of the major interstates, highways and prime arterials.

What Public Space Requirements Are Proposed in the Community Enhancement Overlay Zone?

As part of the Community Plan Update, the Community Enhancement Overlay Zone would apply to provide supplemental development regulations for specific areas within the Mid-City Communities to increase the amount of public space within the community, aligning with the Urban Design Framework for areas of the greatest density increases. Overlay Zone Regulations would supplement the underlying base zone regulations to ensure that new development in the mixed-use corridors and villages would be supported by community enhancements, including pedestrian access, public spaces and connectivity improvements.

The Mid-City Communities would be added to the Community Enhancement Overlay Zone, a development regulation in the municipal code that requires new public spaces to be included along with new development on sites over 10,000 square feet, as shown on Attachment 15. The overlay zone would require new development in villages and along commercial corridors to provide publicly accessible spaces and recreational amenities and include a 5-foot greenway requirement to improve the experience for people walking. Development adjacent to Interstate 805, State Route 15, or State Route 94 would be required to include a 30-foot setback for public spaces along the freeway frontage. This setback would serve as a buffer and would not count toward required public space. Required public spaces would be located elsewhere on the site, away from the freeway frontage, to limit user exposure to freeway noise and air pollution. Generally, most lots are 120 feet deep.

How does the Draft Communities Plan get implemented?

The Draft Communities Plan guides decision-makers, staff, property owners and community members engaged in community development. Key implementation actions include private investment through development consistent with the planned land uses, base zones, overlay zones and development regulations in the Municipal Code; public facilities and infrastructure included in the citywide Capital Improvement Program. Future infrastructure and public facilities identified in the Community Plan would be implemented through this citywide process, which includes prioritization and opportunities for public input.

What are the next steps for the Mid-City Communities Plan Update?

City staff will continue analyzing feedback on the Draft Communities Plan to prepare a Public Engagement Summary. An economic study, park and urban design renderings, and additional mobility analysis will also be completed to inform the Second Draft of the Mid-City Communities Plan. Following the release of the Second Draft, City staff will host a series of community open houses, convene the final Working Group meeting, and present the Second Draft to the four Mid-City planning groups. A Planning Commission hearing and recommendation is anticipated in Spring 2027.

CONCLUSION

The City Planning Department is presenting the third workshop for the Mid-City Communities Plan Update to seek input from the Planning Commission on the first draft of the update to the Mid-City Communities Plan. Staff will consider input from the Planning Commission, Mobility Board, Park & Recreation Board, Historical Resources Board, the Mid-City Communities Plan Update Working Group, City Heights Area Planning Committee, Eastern Area Communities Planning Committee, Kensington-Talmadge Planning Committee, Normal Heights Community Planning Group, businesses, community-based organizations, and community members, as well as additional technical studies, before the Second Draft. Staff anticipates releasing the Second Draft in early 2027. Documents relating to the Mid-City Communities Plan Update process are available on the following website: sandiego.gov/planning/mid-city-communities-plan-update.

Respectfully submitted,

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Attachments:

1. First Draft Mid-City Communities Plan link
2. Mid-City Planning Area and Neighborhoods
3. Preliminary High-level Summary of First Draft Plan Engagement
4. Complete Overview of First Draft Plan Engagement
5. Village Climate Goal Propensity Map
6. Planned Land Uses
7. 2026 Opportunity Map
8. Mid-City SB 79 Area
9. Proposed Urban Design Framework
10. Urban Design Concept Analysis link
11. Planned Bicycle Network
12. Planned Transit Network
13. Planned Parks and Trails
14. Fire Rescue Memo for Mid-City CPU
15. Proposed Community Enhancement Overlay Zone Regulation link

Placeholder for Attachment 1: First Draft Mid-City Communities Plan

Click this link to view the First Draft Mid-City Communities Plan

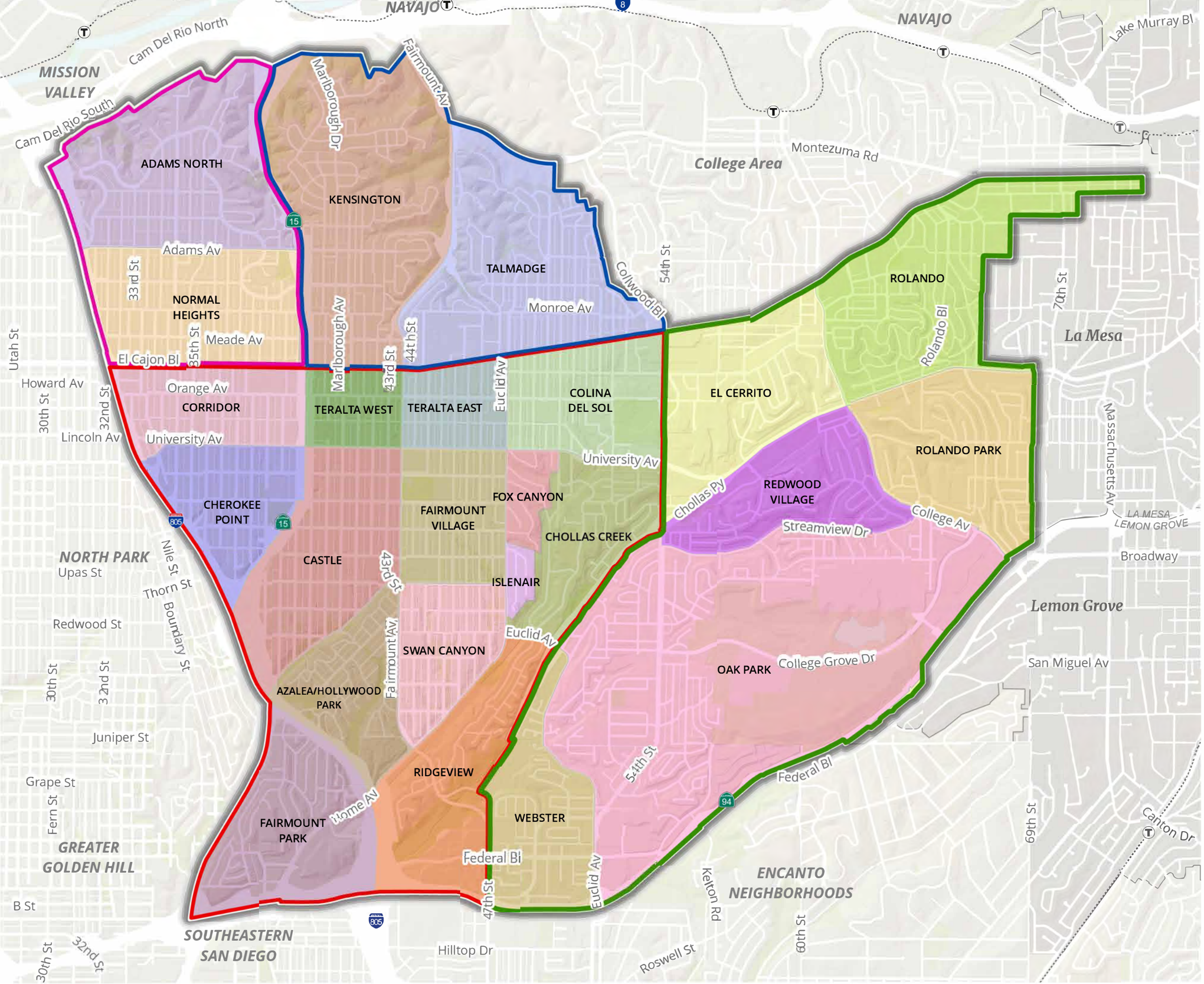
- or visit –

www.sandiego.gov/sites/default/files/2026-08/draft-mid-city-cpu.pdf

Attachment 2

Figure 1-2

DRAFT



Source: City of San Diego, SanGIS, SANDAG

Community Planning Areas

- City Heights
- Eastern Area
- Kensington-Talmadge
- Normal Heights

Ⓣ Trolley Stop

Light Rail Routes

Attachment 3 - Preliminary Summary of First Draft Plan Engagement

Since the release of the first draft of the Mid-City Communities Plan on August 7, 2026, staff has received a range of comments with varying different views. City staff are still analyzing community feedback, however a preliminary high-level summary is provided below:

Mid-City Communities Plan Update Working Group (Attachment 13):

- Re-evaluate proposed density and land-use designations, including corridor and Urban Village expansion, neighborhood-serving commercial uses, and parcel consolidation opportunities.
- Strengthen economic development policies and identify desired commercial uses, while addressing concerns about incompatible businesses.
- Evaluate proposed density increases in relation to fire severity, emergency access, evacuation capacity, and community safety and expand wildfire risk and evacuation planning.
- Further refine the purpose, amenities, and desired character of greenways and public spaces, including the Adams Avenue greenway.
- Expand shade and tree coverage/ consider tree zones around schools, parks, libraries, and corridors, with clear maintenance, irrigation, and long-term tree-survival strategies.
- Analyze the effects of increased density on automobile traffic, roadway capacity, parking, congestion, freeway access, and emergency evacuation.
- Clearly identify the intended function of each corridor and specify improvements to bicycle, pedestrian, and transit networks, including bicycle boulevards, enhanced north–south connections, and transit-priority measures.
- Balance roadway needs by addressing residents' continued reliance on cars while upgrading neighborhood streets adjacent to major corridors to provide safer alternatives for walking and biking.

City Heights Area Planning Committee (Attachment 14):

- Pair growth and increased development intensity with corresponding investments in roads, stormwater systems, parks, public facilities, and other community-serving infrastructure.
- Support multimodal transportation improvements while recognizing that many residents still rely on personal vehicles, and balance future investments across all transportation needs.
- Ensure development respects established neighborhoods and preserves the unique character of City Heights and surrounding communities.
- Keep traffic calming, pedestrian safety, infrastructure maintenance, and environmental considerations as priorities to protect public safety and quality of life.
- Prioritize land uses that deliver direct community benefit, jobs, neighborhood services, and long-term economic vitality, and pair goals with measurable implementation strategies and clear benchmarks to track progress.

Eastern Area Communities Planning Committee (Attachment 15):

- Foster economic prosperity and provide meaningful strategies to attract housing, businesses, and investment, particularly along University Avenue, and ensure the community benefits from the plan's economic development goals.
- Ensure that Eastern Area, including El Cerrito and Chollas Triangle, is adequately represented and that its unique characteristics, priorities, and longstanding challenges are reflected in the plan.

- Expand Park opportunities and strengthen urban greening. Identify opportunities for new parks and open spaces, provide greater clarity regarding the park inventory by community, keep joint-use parks accessible to the public, and prioritize native and drought-tolerant tree species in planting and landscaping efforts.

Kensington-Talmadge Planning Committee (Attachment 16):

- Oppose location and intensity of proposed density and advocates to redirect growth towards commercial corridors while preserving existing residential densities, especially within the existing and proposed historic districts.
- Provide clarity on future development impacts, considering all applicable development incentives and ensure proposed zoning and land use maps are based off accurate population and housing projections
- Ensure infrastructure and public safety improvements are properly funded and planned for before housing development occurs. Growth should not outpace improvements to fire protection and emergency evacuation, transportation and parking, parks and recreation, libraries and community facilities, and water, drainage and other infrastructure needs.

Normal Heights Community Planning Group (Attachment 17):

- Break out plan data, goals, and needs by each of the four Community Planning Areas to better reflect their distinct priorities.
- Include a detailed financing plan identifying the costs, funding sources, and timelines for needed parks, libraries, schools, infrastructure, and other public facilities.
- Only count identified and funded projects toward park targets and ensure joint-use facilities provide meaningful public access.
- Direct greater housing density toward commercial and transit corridors, apply lower densities on residential streets, and complete further historic resources survey to inform future development.

Mobility Board, P&R Board, SANDAG, Caltrans, Community-Based Organizations, and Community Members (Attachment 18):

Mobility Board:

- Increase densities around rapid transit stops and ensure gentle step-downs in densities from community commercial to residential areas.

P & R Board:

- Provide clarity on the Parks and Recreation Inventory Table and its scoring. Provide clarity on the location of the proposed aquatic center, ensuring it is outside the South Chollas Landfill.

SANDAG:

- Identify additional Transit or Flex Lanes on University Avenue, 54th Street, and Euclid Avenue.

Caltrans:

- Recommendations to refine certain policies and proposals which could impact Caltrans' Right-of-Way (R/W).

Coalition Letter from BuildSD, BikeSD, RideSD, and Bike Coalition San Diego County

- Provide more density by creating additional transit-focused housing hubs.
- Identify Adams Avenue as a Class IV protected facility, instead of a Class III Enhanced facility.
- Establish implementation program.
- Save Our Heritage Organisation (SOHO)
- Better reflect existing and proposed historic districts and resources in the second draft.

- Reverse the upzoning recommendation within the existing and proposed historic districts.
- El Cajon Blvd Business Improvement Association
- How to carry over the recent prohibition of self-storage in the Central Urbanize Planned District and expand restrictions on less-active commercial uses such as car storage and drive-through uses, which can limit opportunities for active storefronts.

Normal Heights for Smart Growth

- Create a more robust economic development section.

San Diego Fair Housing Lab

- Conduct additional analysis, such as affirmatively furthering fair housing analysis and air and noise assessment along SR-15 and other corridors.
- Publish residential capacity and public engagement participation by community planning areas.
- SR-15 Transportation Equity and Affordable Housing Task Force and City Heights Built Environment Team
- Various refinements to First Draft policies focused on making sure that future growth and investment in Mid-City supports existing residents, strengthens community assets, and establish clear mechanisms for implementation and accountability.

Fairmount Park Neighborhood Association

- Reverse community commercial land use proposal to existing industrial land use designation within historic burn ash dumps.

The Kensington Talmadge Community Association

- Fire evacuation concern and request for emergency evacuation study

Partnership for the Advancement of New Americans (PANA)

- Make Lea Street bike/ped access-only
- Safe, signalized crossings of University Avenue and 54th Street

San Diego Mountain Biking Association

- Recommendations to better serve mountain bikers, hikers, runners, and other trail users.

Remnant Church and Calvary Evangelical Lutheran Church

- Overall strong support for the First Draft.

City Heights Business Improvement District

- Business owners strongly oppose bike lanes on corridors like Fairmount, Euclid and Adams, fearing lost parking will cut customer access and revenue and overall worsen traffic.

Normal Heights Business Improvement District

- Against any proposal that reduces street parking, such as a Class IV facility on Adams Avenue.

Neighbors for Better San Diego

- Lack of economic development plan and financing plan.
- The proposed new housing capacity ignores existing state and local incentive programs.
- Reverse upzoning recommendations in Kensington-Talmadge.
- Support Kensington-Talmadge CPG Alternative Zoning Plan
- Suspend Complete Communities Housing Solutions for recently adopted community plan updates.

Kensington Fire Safe Council

- Request for quantitative, location-specific analysis of wildfire evacuation capacity.
- Concern about lack of water to fight wildfire.

Normal Heights, Kensington-Talmadge Residents:

- Many residents of Kensington-Talmadge and Normal Heights oppose upzoning in single-

family areas. Community members are concerned that Complete Communities and other bonus programs can be stacked to increase density and propose that housing capacity be directed to El Cajon Blvd and other corridors.
- Exclude the Talmadge Park Estates Historic District and other proposed historic districts from upzoning and retain existing residential densities.
- Concerned that many streets in Kensington and Talmadge have few exits and evacuation choke points. Create an evacuation plan and build the new fire station before density increases are approved.
- No townhomes in Talmadge Historic District

Little Saigon/Vietnamese community member comments:

- Explore design guidelines for future development to enhance the Little Saigon Cultural District
- Concern about the loss of parking on El Cajon Blvd from the expansion of Bus-Bike Lane

Community member comments related to parks:

- Fund and require parks and public facilities before or alongside density,
- Add and improve usable green space and trails by creating real parks (not tiny parklets), expanding and supporting the SR-15 freeway cap park and implementing shade and tree-canopy goals and green corridors.
- Enforce joint-use Agreements (Normal Heights Elementary, Webster Elementary), reopen and maintain park bathrooms, and verify proposed park sites with on-the-ground visits so that existing and planned facilities are usable.

Community member comments related to affordability and anti-displacement:

- Strengthen anti-displacement and affordability measures to address rising rents and clarify where current families will go.
- Protect single-family homes in City Heights
- Community member comments related to mobility
- Build a comprehensive mobility and bike network by upgrading Adams Avenue to a Class IV facility, replacing bus-bike lanes on El Cajon Blvd with separated lanes, and adding connected north-south routes, with direct links such as a pedestrian and bike bridge over I-15 to South Park.
- Speed up and expand transit by adding dedicated bus lanes and Rapid routes and planning for the Purple Line, with commitments that transit service is funded and guaranteed before density is approved.
- Improve safety and access for people walking, including continuous sidewalks, safer crossings, and fixes at problem intersections like Euclid Ave. /Monroe Ave. /Aldine Dr.
- Community member comments related to Community Enhancement Overlay Zone:
- Creating additional regulatory requirements along the corridor incentivizes infill development in neighborhoods away from the transit corridors.
- Recommend adding Supplemental Design Regulations with 5-foot side and rear setbacks to ensure that fire fights have access to properties and be consistent with zone zero and brush management standards.

Post Cards

Community members mailed in 376 postcards that expressed concerns over adding density in Talmadge Park Estates Historic District, called to prioritize fire safety, and building along the corridors rather than up in historic neighborhoods.

Attachment 4. Complete Overview of First Draft Plan Engagement

Planning Groups/ Working Group

Organization	Reference	Page #
Mid-City CPU Working Group	Appendix 1	3
City Heights Area Planning Committee	Appendix 2	12
Eastern Area Communities Planning Committee	Appendix 3	16
Kensington-Talmadge Planning Committee	Appendix 4	18
Normal Heights Community Planning Group	Appendix 5	41

Letters

Organization	Reference	Page #
SANDAG	Appendix 6	49
Caltrans	Appendix 7	52
Urbanist Coalition (BuildSD, BikeSD, RideSD, and Bike Coalition San Diego County)	Appendix 8	56
Save Our Heritage Organisation (SOHO)	Appendix 9	61
El Cajon Blvd Business Improvement	Appendix 10	63
Normal Heights for Smart Growth	Appendix 11	64
SR-15 Transportation Equity and Affordable Housing Task Force and City Heights Built Environment Team	Appendix 12	76
Fairmount Park Neighborhood Association	Appendix 13	90
The Kensington Talmadge Community Association	Appendix 14	91
Partnership for the Advancement of New Americans (PANA)	Appendix 15	94
San Diego Mountain Biking Association	Appendix 16	97
Remnant Church	Appendix 17	101
Calvary Evangelical Lutheran Church	Appendix 18	102
Neighbors for Better San Diego	Appendix 19	105
Kensington Fire Safe Council	Appendix 20	124
YIMBY Democrats	Appendix 21	128
Resident: Leslie Zoref	Appendix 22	136
Resident: Madeleine Baudoin	Appendix 23	137
Jim Bliesner	Appendix 24	140
San Diego Fair Housing Lab	Appendix 25	143
Mobility Board	Appendix 26	321

Meeting Notes/ Event Summaries

Organization	Reference	Page #
Mobility Board (Notes and Minutes)	Appendix 27	325
Park & Recreation Board	Appendix 27	325
PANA Resource Fair	Appendix 28	330
Little Saigon/ Vietnamese Communities	Appendix 29	332
Business Improvement Districts (City Heights, Adams, College)	Appendix 29	332

Community Submittals

Organization	Reference	Page #
Postcards	Appendix 30	334
Emails	Appendix 31	338
Public Comment Form	Appendix 32	457

Mid-City Communities Plan Update Working Group First Draft Comments

Background and Purpose

The City of San Diego released its first draft of the updated Mid-City Communities Plan (draft plan) on August 7, 2026. Consistent with the citywide growth strategy established in the City's General Plan, the draft plan incorporates community input received to date and outlines a 30-year planning framework for the Mid-City communities. The plan addresses land use, mobility, parks, public facilities, sustainability, urban design, and historic preservation.

The City of San Diego City Planning Department solicited input on the first draft from various members and organizations representing the Mid-City communities, including the Mid-City Communities Plan Update Working Group. On September 18, 2026, the City of San Diego City Planning Department hosted its eighth Working Group to review and discuss the first draft of the updated Mid-City Communities Plan. The meeting provided an opportunity for Working Group members and members of the public to share feedback and identify issues for further consideration.

This document compiles Working Group members' comments received during the September meeting, as well as written comments submitted to the city by email. Comments are organized by chapter to facilitate review and reference.

The compiled comments are preliminary and are being circulated to Working Group members for review, clarification and approval. Following this review process, the comments will be finalized and documented as the official comments of the Mid-City Communities Plan Update Working Group on the first draft plan.

Comments

General

#	COMMENT
1	The presentation states that the community plan is not a regulating plan and asked that the plan more clearly explain what it is and what its role in guiding future development.

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2	Compared the draft with other community plan updates and suggest adding more imagery, color and visual elements. In addition to renderings, for example photographs could help make the plan more engaging and visionary.
3	Not enough outreach to the business community.

Land Use and Economic Prosperity

#	COMMENT
4	Recognize and evaluate the hundreds of postcards protesting the densities proposed.
5	If there was no specific reason for excluding Adams Avenue, suggestion to add Adams Avenue as one of the listed streets in Land Use policy 2.1 that discourages certain auto-centric uses.
6	Suggest making neighborhood-serving commercial uses allowed everywhere, including small corner stores in all lower-density residential zones.
7	Kensington-Talmadge is not interested in corner stores. A neighborhood poll conducted showed 12% support for corner stores and questioned whether this use is popular in the community.
8	In addition to breaking down the park inventory by community, the residential capacity should also be broken out by planning area in the second draft.
9	Suggestion to add a policy allowing property owners or developers to consolidate parcels, subject to City approval and a public-hearing process, so larger developments could include parks, amenities and street improvements. This would provide a mechanism for investment where zoning limitations or small parcel sizes otherwise prevent larger projects that could use the Urban Village land use designation.
10	Consider designating more parcels along the corridors beyond existing strip malls to be Community and Urban Villages.
11	Request stronger anti-displacement protections: Meaningful measures to protect long-term residents and preserve existing affordable housing as neighborhoods experience redevelopment.
12	Support the addition of more Urban Villages. The speaker described the convenience of living in an existing Urban Village in City Heights, where residents can access a pharmacy, grocery store, other shops, a library and a park, and would like to see more locations if possible.
13	Request true housing affordability: policies that consider the total monthly cost of housing, including utilities, parking, storage and other required charges, rather than rent alone.
14	Include language identifying the types of commercial businesses the community wants along corridors, rather than only identifying uses to discourage, such as tire shops and storage facilities.

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15	Include language supporting electric-vehicle charging infrastructure in neighborhoods and along corridors as seen in other cities. Consider curbside charging options for homes without garages.
16	Community members have expressed concern about the proposed land-use changes on Euclid Avenue, south of Landis Street, toward Redwood Street, some areas currently designated residential would be redesignated for commercial uses. Residents have observed revitalization, including former auto-repair buildings being converted to duplexes and other duplex development, and are concerned that commercial designation could attract undesirable businesses. The request is to retain the residential designation in the area.
17	If commercial uses are pursued on Euclid Avenue, south of Landis Street toward Redwood Street, the plan should be intentional about the types of businesses allowed or encouraged, potentially through a policy, rather than allowing uses such as liquor stores and smoke shops.
18	Expand the economic development chapter, which is a priority for the Normal Heights community.
19	Add a graphic or explanation to the fire safety section on page 63 showing the relationship between very high fire severity zones and proposed land use, possibly through an overlay as shown in the presentation. This could clarify why certain areas remain at a lower density due to canyon proximity and limited safe evacuation routes along major corridors.
20	Add stronger language on anti-displacement measures, including a first right of refusal for displaced residents to purchase new affordable and market-rate units.
21	Formal request for the City to strengthen its proposed housing, land-use and anti-displacement policies.
22	The next draft should directly address the financial barriers that threaten housing stability, including utility costs and additional housing fees.
23	Request that the City explain how its proposed policies will protect existing residents, prevent displacement and coordinate with homelessness programs to produce measurable, long-term results.
24	Request homelessness funding accountability: Public reporting of how funding is allocated, which programs receive it and measurable outcomes demonstrating whether individuals achieve lasting housing stability.
25	Request permanent Supportive Housing oversight: Evaluation of whether participants receive the ongoing services and housing stability these programs are intended to provide.

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Historic Preservation

#	COMMENT
26	Address concerns about potential bias or misinformation regarding the Mills Act and other historic preservation processes.

Sustainability, Equity, Resilience and Conservation

#	COMMENT
27	Wildfire evacuation is a significant community concern but receives little attention in the plan. Add more detail on wildfire evacuation.
28	Consider addressing the proposed state legislation concerning balcony solar, identified as AB A4A in the comment, if signed by the governor.
29	Consider the impact of the Los Angeles fires and address how the plan will protect residents from similar disasters. Add fire safety to a future meeting agenda, as previously promised.
30	Reconsider upzoning near high-fire-risk areas considering fire danger and evacuation constraints. Account for the high-fire-risk areas in North Kensington and the limited evacuation routes available to residents.

Urban Design

#	COMMENT
31	The proposed five-foot public-space greenway on Adams Avenue between I-805 and Van Dyke Avenue is promising, but the plan should more clearly define its purpose and vision. Further evaluate how the greenway can make Adams Avenue a more inviting place to gather and specifically clarify whether it is intended to provide additional tree canopy, seating, outdoor gathering spaces, or other public-space amenities.
32	Page 92 currently states that an alternative option to limit the Leah Street extension to bicycle and pedestrian access only should still be considered. The community has requested that the plan fully adopt a bicycle- and pedestrian-only connection on Lea Street.
33	The plan should clearly state that Lea Street will be a bicycle- and pedestrian-only street, rather than saying this option will be “considered.”

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Mobility

#	COMMENT
34	Include Transit Signal Priority for Rapid routes or clarify whether this should be addressed through the Community Plan or a separate City Council policy document. Transit-priority signals would help Rapid routes operate as intended.
35	Support the proposed transit lanes on El Cajon Boulevard and the planned Class IV bikeways on Fairmount Avenue.
36	Explain how corridor roundabouts are designated.
37	Add a roundabout on Poplar Street in Azalea Park.
38	Support a bike boulevard on Manzanita Drive, adjacent to the proposed roundabout on Poplar Street.
39	Clearly distinguish standard Class III facilities from Class III Enhanced facilities, particularly where traffic diverters are proposed. Recommend a Class III facility with traffic diverters on Manzanita Drive in City Heights/Azalea Park, similar to the Orange Avenue Complete Streets project
40	Improve bicycle network graphics, the details are difficult to read. On some corridors, particularly 35th Street, four or five bicycle facility classifications overlap, making it difficult to distinguish proposed facilities from existing facilities.
41	A broader concern is that parts of the document do not feel sufficiently grounded. Figures 5-6, 5-7, 5-8 and 5-10 identify transportation-related features such as green corridors and multi-mobility corridors but do not clearly specify the intended improvements for each corridor.
42	The plan should identify the specific mobility focus for each corridor rather than broadly labeling a corridor for "mobility improvements." For example, Orange Avenue should be identified as a bicycle mobility corridor, with the tools and strategies needed to develop it as a high-quality bicycle route. This level of specificity should be applied consistently across the plan.
43	Add pedestrian crossings along University Avenue to improve connections between the north side of the street and the Chollas Creek area.
44	Expressed concern that many Eastern Area streets were built in the 1930s and are not designed to accommodate increased traffic or serve as collector and connector roads for higher-density development.
45	The fire on Montezuma Road is an example of the challenges that can arise during emergencies when streets become congested; events like these should be taken into consideration.
46	Raised concerns about parking overflow and congestion in Eastern Area neighborhoods, including Kensington and Talmadge, particularly along collector roads and intersections.
47	Supported biking and public transit but emphasized that the proposed density increases require a comprehensive plan for managing roadway capacity, parking, traffic and emergency access.

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48	Concerned about the impacts of proposed density increases in City Heights along El Cajon Boulevard and University Avenue. Residents may continue to rely on cars because local employment opportunities and transit access do not eliminate the need to travel outside the neighborhood. For example, tech jobs are not down the street from the communities but are in Sorrento Valley. Hope to see the design guidelines released in the next draft.
49	In City Heights, multiple generations may live in one home, resulting in several vehicles per household and increased parking demand in surrounding neighborhoods. Include stronger consideration of parking minimums and parking infrastructure required in the next draft, particularly given proposed increases in allowable density from approximately 73 to 218 units in some areas.
50	Strong support for increased density, provided the city thoroughly analyzes transportation impacts. Approximately 95% of Mid-City residents reportedly drive. The first draft needs to plan for automobiles alongside transit, biking and walking to improve traffic flow and protect the safety of all road users.
51	Improve how residents travel into and out of neighborhoods, particularly during emergencies.
52	Congestion problems on Collwood Boulevard and Montezuma Road while waiting to access the freeway, as well as issues where El Cajon Boulevard and University Avenue connect to freeways. Recommend better planning for connections between SDSU, neighborhood streets and Interstates 15 and 8.
53	Expressed concern with the mobility section, including its vision, goals and introduction, for not explicitly mentioning automobiles. Recommend that the city conduct a more comprehensive transportation analysis that includes automobiles, not just cycling, pedestrians and transit, before substantially increasing neighborhood density.
54	The road diet on Collwood Boulevard reportedly shifted approximately 3,000 daily trips onto Aldine Drive, Euclid Avenue and Monroe Street and other streets that may not be equipped to handle additional traffic. Reducing vehicle capacity on one street does not eliminate vehicle trips; it may simply shift congestion to other streets. Recommend more comprehensive analysis of these effects.
55	Expressed concern with the proposed greenways and pedestrian corridor maps for appearing to simply designate existing collector streets as greenways without additional or sufficient analysis of the broader transportation network.
56	Invest in side streets to create safer, more practical routes for alternative modes of transportation. Referenced Dutch urban planning approaches that separate roads for cars, bicycles and pedestrians where appropriate, noting as cyclists and pedestrians can also experience conflicts. Consider separation of modes by roads in the draft plan.
57	Explicitly identify the intended function of each corridor. For example, Orange Avenue could be designated as a bicycle boulevard, with clear expectations for

	how vehicle traffic would be managed. The term “green corridor” is too vague without defined objectives, design standards and implementation strategies.
58	Leaving the plan open to interpretation could create conflicts in future development decisions. Provide clear guidance that can be used to evaluate proposals against the plan's stated goals.
59	Strongly recommend adding bicycle boulevards as a distinct classification for bicycle facilities in the plan. Enhanced bike routes may involve relatively minor improvements like sharrow, while bike boulevards can more substantially prioritize bicycle travel. If one mode of transportation per road, then for bike use, the appropriate facility would be a bike boulevard. The planned improvements on Orange Avenue are an example of a bicycle boulevard that could be proposed.
60	Review Figure 6-4 on PDF page 131 and clarify of the roadway classification symbols, including 2C, T, M and CL, request to add an appropriate key of symbols.
61	Reconsider the proposed lane configuration for 54th Street, the street has high speeds and is unsafe for pedestrians. Cited the 2016 death of Jonathan Cortez, who was struck and killed while attempting to skate home on a street that had lacked sidewalks on both sides for decades. Consider two dedicated transit-only lanes for the future Rapid 625 service.
62	Will 43rd Street be converted back to two-way traffic and has it been evaluated as part of the mobility analysis?
63	Clarify the proposed lane configuration for Fairmount Avenue south of Home Avenue, if there are four lanes proposed.
64	Study upgrading the proposed enhanced Class III bicycle route to a higher-quality facility, such as a Class II or Class IV bikeway at Adams Avenue.
65	Create more safe north–south routes, specifically proposing 42nd Street and Chamoune Street as a bicycle-pedestrian boulevard.
66	Create better north-south bike/pedestrian connections between Adams Ave, El Cajon Blvd and University Ave.
67	Reconsider mobility vision and the assumption that residents will shift to walking, biking, or public transportation. Ensure parking policies reflect residents’ reliance on cars for commuting, grocery shopping and other daily needs. Avoid using New York City as a comparison due to its significantly more extensive public transportation network.
68	Upgrade neighborhood streets adjacent to major corridors to Class III bike routes to reduce conflicts between cyclists, vehicles and buses, particularly as more frequent bus service and dedicated bus lanes are planned for major corridors. Also recommend traffic-calming measures on neighborhood streets to provide safer alternatives to major arterials and connector roads for active transportation.
69	Design calmer streets near schools and parks to prioritize pedestrian and bicycle safety, potentially incorporate tree-shade corridors.

Parks and Public Facilities

#	COMMENT
70	Separate public facilities and park inventories by community. Each community should be able to understand what facilities are available within its own neighborhoods.
71	One of the biggest issues raised by students is need for more shade. In addition to looking at tree corridors, the plan should consider tree and shade zones around schools, libraries and parks.
72	Suggest upgrading Euclid Avenue south of Landis Street from a secondary corridor to a green corridor or primary corridor, with an emphasis on additional trees and landscaping.
73	Concern that trees planted as part of greenway projects do not always survive after initial planting. Include Community Plan language requiring ongoing irrigation or a durable watering and maintenance approach so trees can establish and provide lasting shade as temperatures rise.
74	The aquatic center in El Cerrito was recently renovated, but its parking lot was not improved and is not an ideal experience. Explore whether part of the oversized parking lot could be converted to a mini-park, dog area, or another recreational use while retaining necessary parking.
75	Explore recreational opportunities at the underused parking lot at the south end of Colina del Sol, which is reportedly only used for special events.
76	Explore joint-use opportunities at Mann Middle School, particularly the underused blacktop area on the southern end of the property along Trojan. Opportunity to create a more park-like shared-use space, rather than a field, that benefits both the school and the community, and exploring similar opportunities at schools throughout the communities.
77	In addition to watering schedules or a street-tree maintenance policy, the plan could encourage the use of enhanced soils, specifically CU-Structural Soil, which allows tree roots to grow beneath concrete or other structures. This could be especially helpful along narrower parkways on Adams Avenue, where trees constrained by grates or limited planting areas cannot expand their root systems and reach full maturity. Consider including this as a requirement or recommendation to support greater tree canopy along corridors.
78	How will street-tree corridor network be implemented? Street trees have been removed along pedestrian-oriented streets in City Heights in recent years, raising questions about the strategy for establishing and maintaining a connected street-tree network.
79	Echoed concerns about the street-tree network, noting similar canopy issues along Adams Avenue in Normal Heights.
80	Expand the discussion/mention of the Normal Heights library beyond its current label in the Adams Avenue Corridor Study graphic.

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81	Consider both expansion of College Area-Rolando library services and preservation of existing parking, which may be lost
82	Echoed the importance of shade and walkability raised by other participants. Explore whether shade could be incorporated as a measurable element of the infrastructure plan, allowing the city to better evaluate progress toward providing shaded pedestrian environments.
83	Reassess the proposed park based on feasibility to build and maintain.
84	Ensure proposed parks provide functional amenities and recreational value, rather than simply benches, greenery, or trees along busy streets.

Implementation

#	COMMENT
85	There are irregular parcel shapes within the Community Enhancement Overlay Zone. Some areas are immediately adjacent to the main corridors, while others extend further inward and create what appear to be unusual square-shaped areas. What was the rationale for these boundaries?
86	Marcela Escobar of the Atlantis Group stated that the requirement for public access, through the Community Enhancement Overlay Zone, creates a liability risk that many developers are concerned about and that could become a roadblock to development. What led the city to conclude that this is not a significant concern?
87	Require immediate implementation and accountability in plan: clear actions, responsible departments, funding sources, measurable goals and realistic timelines for addressing these concerns.

DRAFT

CHAPC Feedback on the Mid-City Communities Plan Update (Draft 6.1)

Cover Memorandum
City Heights Area Planning Committee (CHAPC)

Purpose

The City Heights Area Planning Committee (CHAPC) appreciates the opportunity to review and provide feedback on the Draft 6.1 Mid-City Communities Plan Update. Following presentation of the draft plan to CHAPC, the committee established a subcommittee to conduct a detailed review of the document and identify areas warranting additional discussion, clarification, or revision. The comments contained in Attachment A represent the detailed findings and recommendations developed through that review process.

Key Themes Identified During Review

Infrastructure and Public Investment

Growth and increased development intensity should be accompanied by corresponding investments in roads, stormwater systems, parks, public facilities, and other community-serving infrastructure.

Transportation and Mobility

CHAPC supports multimodal transportation improvements while recognizing that many residents continue to rely on personal vehicles. Future investments should balance all transportation needs.

Community Character and Neighborhood Compatibility

Development should respect established neighborhoods and preserve the unique character of City Heights and surrounding communities.

Public Safety and Quality of Life

Traffic calming, pedestrian safety improvements, infrastructure maintenance, and environmental considerations should remain priorities.

Economic Development

Land use decisions should prioritize activities that provide direct community benefit, employment opportunities, neighborhood services, and long-term economic vitality.

Implementation and Accountability

Goals should be paired with measurable implementation strategies, infrastructure planning, and clear benchmarks to evaluate progress.

Attachment A: Detailed CHAPC Review Comments

The following pages contain the complete subcommittee comments, findings, page-specific recommendations, and supporting observations. The detailed comments should be considered an integral part of this submission and should be reviewed in conjunction with the summary themes presented above.

Conclusion

CHAPC appreciates the efforts of the Mid-City Communities Plan Working Group and respectfully submits the attached comments for consideration. The committee looks forward to continued collaboration throughout the planning process.

1. **Planning Area and Neighborhood**

- Azalea Park and Hollywood Park are two different neighborhoods Table 1-2, Pg 6
- Clarification on the Colina name, feedback from community to determine name Pg 6
- Ridgeview and Webster Neighborhoods are separate neighborhoods.
- Pg 9, Table 1-2, Decrease in population needs to be analyzed and explained. We request that the reason for the decrease in population under section *Population* be added after the statement of the -11,200 people.

2. **Land Use and Economic Prosperity**

- The vision does not include driving, something that is necessary for our residents. We do not agree to prioritize walking, biking, or rolling spaces without mention of protecting our roads as they are now. We request prioritizing the maintenance of the roads to include repairing storm drains prior to new construction projects.
- Areas where single family homes surround schools should be designated residential with no more than two stories. Request the blocks starting from Highland to Euclid in between University and Wightman, change from Residential Medium - 4 to Residential Medium - 1 and change Community Commercial 74 - 109 to 0 - 44.
- Additionally, we request that Wightman, primarily the blocks to the direct east and west of I-15 remain as is and do not increase to Residential Medium 4 as the air and noise pollution will increase and that does not align with the overall goal of the plan.
- On page 13, Land Use, the map proposes to change part of Euclid Avenue from residential to commercial. The current zone, south of Wightman, allows for residential with some small business activity, or 100% residential if the property owner desires. Since then an auto repair became duplexes and another duplex was built as well. There is interest in building residential on this section of Euclid. Also the type of businesses this part of Euclid has attracted are not neighborhood serving commercial, but problem properties that the neighbors have to work with code enforcement to abate. Additionally, the paper street of Ontario and the surrounding vacant lots should be designated as a potential park site. This park would connect the Fox Canyon Neighborhood and the Chollas Creek Neighborhood. I think it's designated as residential on the map.
- Page 33, Commercial 2.1: Discourage and support the prohibition of self-storage, billboard, tire shop, mechanic, car storage, automated vehicle fleet management and maintenance. must include Euclid Avenue in addition to El Cajon Boulevard, University Avenue, and Fairmount Avenue.

4. **Sustainability, Equity, Resilience and Conservation**

- Euclid Avenue from Home Avenue to El Cajon Blvd should be designated a Primary Green Corridor. That's what the Euclid RAP envisioned, traffic calming and street trees throughout the Corridor. Euclid is one of two north south streets thru City Heights, (Fairmount the other) and it deserves to be shown some love!
- Request strawberry trees along Euclid. Replace current trees with bigger trees.

- From Euclid to the I-15 along Wightman to the I-805 must be turned into a green corridor by adding native California canopy trees such as the California Bay Laurel or Interior Live Oaks.
- Page 61, Reconnecting Communities - We request a study on the impact of construction on businesses along University Avenue and El Cajon Boulevard before and after the I-15 construction and the 2023 - 2026 project along University Avenue. These are important details in Mid-City history that disrupted the stability of our small businesses.
- Page 57, Sustainable Design - There must be infrastructure to support the reduction of reliance on cars, there cannot be a plan without infrastructure.
- The current community infrastructure in the area is designed to increase the construction of new apartment buildings without parking and the plan (pg 56)
- Pg 101, Recommend the comment “Potential to introduce new parks” is repositioned to align on the visual diagram with the green asterisks on Euclid as it currently looks like it pointing to the pink asterisks which is confusing.
- Pg 102 - we support the bridge across Euclid Ave to connect the east and west sides of Dwight as well as the revitalization of existing canyon entries.
- Page 102 We support the creation of parks near canyon entrances.
- Pg 103, need to not approve anymore storage spaces needed to highlight residential and commercial that supports daily residential uses.
- Pg 106, Poplar St needs to add speed humps, roundabouts, and high visibility pedestrian crossings along Poplar - is it dangerous now with speeding vehicles and vehicles doing donuts at the intersections and low visibility intersections especially Poplar and Columbine.
- Pg 106, Poplar St needs to add a green corridor with more shade trees, planters, and green features that also help with flooding.

EACPC response to MCCPU Draft 1

1. Fostering economic prosperity is supposed to be one of the priorities of the update. Our concerns:

   - Eastern Area is a low resource area. However, unlike City Heights, also a low resource area, we are not adjacent to a higher resource area.
   - Outside of the College Business District, our communities do not have a BID or a MAD to promote and foster business growth.
   - With the exception of the Rapid 215, Eastern Area will not see more Rapid Transit until 2035 and the Purple Trolley line until 2050 at the earliest.
   - The differences and lack of commonalities between Eastern Area and the other three Mid-City communities are clear on pages 18-21. It's critical to acknowledge and address the differences.
   - In 2025, 99% of housing permits in the Eastern Area were ADUs. ADUs do not promote economic prosperity and will not fix the housing shortage.

   What would spur housing and business in the Eastern Area to foster economic prosperity? Please include specifics in Draft 2.

2. The Eastern Area should include the Chollas Triangle community with the boundaries as established in the 2015 amendment.

   Please include in Draft 2.

3. Draft 1 reports engaging more than 3,000 residents across more than 100 events but the qualitative summary doesn't indicate whether all four planning areas were proportionately represented.

   We request that participation be published by planning area and that any future engagement efforts should return to the planning areas that this process did not reach to include equitable participation.

4. Please separate parks and expected residential density by planning areas as requested at the September 18th working group meeting.

5. The Ideas Report stated that additional density between El Cajon Boulevard and University Avenue and along the SR-15 corridor would be studied while assessing air and noise pollution.

   It's not included in the first draft. Will it be in the second draft?

Other

1. Section 1, page 8, states "Since the 1998 community plan, Mid-City has seen significant expansion of parks, schools, and other public facilities."

   Where is the data to support this statement? Please provide specifics.

2. In Section 2.1, can adult entertainment businesses and massage parlors be added to the list of businesses to be discouraged? Other recommendations include additional car washes, gas stations, automotive businesses, and liquor stores, all repetitive low-value businesses that discourage housing and services that residents want to see on transit corridors.

3. In Table 4.1 on page 67, for University Ave, please replace the Jacaranda with a non-flowering tree such as the Chinese Elm as is suggested for other corridors. Flowering trees like Jacarandas are a poor choice for corridors without a BID or MAD to take care of sidewalk maintenance like the Eastern Area section of University Ave. ***But Eastern Area would prefer that native trees and plants be used in planting in our communities***.

4. In Section 5, recommend that pages 87-88 be rewritten to include the possibility of other future cultural districts, not just the two included here. It seems likely that will occur during the next 30 years.

5. Section 5.72, page 117: Please explain how this will happen when location of trash containers on corridors is determined by MTS and BIDs/MADs. To date, Eastern Area community organizations have been unsuccessful in getting additional trash containers to help control littering on the University Ave, 54th St/Euclid Ave, and College Ave corridors.

6. Section 5.74, page 117: Be more specific about where these pedestrian paths would be located on the University Ave corridor. On the south side of University, this doesn't seem likely.

Suggestions for additional parks/green spaces

1. Joint use agreements for joint use parks in park-deficient communities should be modified from the standard agreement to ensure that communities have more equitable use of the park than outside sports groups. Passive use designation should be used as needed to ensure community equity.

2. Additional areas for parks/green spaces consideration:
   a. *El Cerrito:* Three areas were suggested at the 9/18 working group meeting; even though one is in City Heights, all could provide additional park space close to El Cerrito.
      - Repurpose part of the parking lot at the Colina del Sol aquatic center, which is in El Cerrito into a small park for the El Cerrito community.
      - Repurpose the underutilized parking lot at Colina del Sol into additional park space.
      - Expand asphalt area and underutilized field on Trojan Ave at Horace Mann Middle School into park space for joint use.

   b. *Redwood Village:* The vacant lot at University Ave/60th.

   c. *Rolando:* Solita Linear Park, recently defunded from the Pendleton Park project.

   d. *Rolando Park:* Recommend the vacant lot on the west side of the Rolando Blvd/Vista Grande intersection be considered as a possible pocket park; it is one block south of University Ave. Groundwork has indicated that it could become a floodable park and alleviate the flooding issue at the adjacent stormwater channel as well as provide some pocket park amenities.

   e. *Webster:* Request that Webster Elementary be considered for a joint use park.

Minor (typos, etc.)

Section 5.3, page 112: "Include a vary building rooflines" should read "Include a variety building rooflines"

Page 142, Sunshine Berardini Neighborhood Park: Sunshine Berardini is *not* a neighborhood park.

Page 144, Fire: "Mid-City is served by six fire stations:" only five are listed.

Kensington Talmadge Planning Group
P.O. Box 600904, San Diego CA 92160

October 19, 2026

Alex Frost
Principal Planner
Planning Department, City of San Diego

RE: First Draft - Mid-City Communities Plan Update

The official response of the Kensington Talmadge Planning Group (KTPG) to the City's First Draft Mid-City Communities Plan, approved by a majority vote of the KTPG Board on October 19, 2026, is attached to this letter.

KTPG's position is not that Mid-City should remain unchanged. It is that the City should accommodate growth where it makes the most planning sense and protect established neighborhoods and communities, especially those that provide the most affordable path to entry-level home ownership. The City should also protect historic resources, and must protect public safety and demonstrate that essential infrastructure can support additional residents before authorizing substantially higher density.

The overarching themes of these comments fall into three major categories:

1. Opposition to the location and intensity of proposed density
KTPG does not advocate eliminating housing growth. It advocates redirecting much of that growth toward commercial corridors that are in dire need of redevelopment, while preserving existing residential zoning. Our proposed SB 79 alternative is central to this position.

2. Concern that the City is understating development impacts and basing the need for this development on faulty demographics
We maintain that the City's plan does not adequately disclose what could actually be built once all applicable development incentives are considered. In addition, we believe there are valid questions about the City's population and housing projections, as well as the underlying justification for the scale of proposed upzoning and density increases.

3. Insistence that infrastructure and public safety precede growth

We also contend that the City presents speculative future infrastructure and transportation improvements with insufficient acknowledgment of their uncertain funding and feasibility. Housing development should not outpace improvements to:

- Fire protection and emergency evacuation.
- Transportation and parking.
- Parks and recreation.
- Libraries and community facilities.
- Water, drainage, lighting and other infrastructure.

It is our goal in providing these comments well in advance of the release of the Second Draft Mid-City Communities Plan to allow for ample time to incorporate these ideas and data into that document. We are also with this letter formally requesting a meeting with you and the City Planning Department to discuss our comments and in particular our SB79 TOD Alternative Plan. This meeting was agreed to verbally in the September 21st KTPG in-person meeting when the First Draft Plan was presented. As stated in our attached comments, we believe we have a different, but equally compliant approach to the SB79 Alternative Plan. We want to discuss this alternative plan further and demonstrate that it achieves legally required housing capacity while reducing the impacts to the single-family neighborhoods, existing and proposed historic districts, and Very High Fire Hazard Severity Zones.

We trust you will give our recommendations worthy consideration and look forward to working with you and the Planning Department to arrive at a Mid-City Communities Plan that is acceptable and beneficial to all the Mid-City communities, including Kensington and Talmadge.

Respectfully yours,

Neil Winner

Neil Winner
Chair, Kensington Talmadge Planning Group

cc: Morgen Ruby, Senior Planner
Selena Sanchez Bailon, Assistant Planner
Victoria LaBruzzo, Chair, Community Planners Committee
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Paul Coogan, Chair, Normal Heights Planning Group
Lynn Edwards, Chair, Eastern Area Planning Group
Kanoa Cavaco, Community Representative, Council District 9

KENSINGTON-TALMADGE PLANNING GROUP

FIRST DRAFT MID-CITY COMMUNITIES PLAN RESPONSE

October 19, 2026

OVERALL COMMENTS ABOUT THE ENTIRE PLAN

Unlike most Community Plan Updates that focus on one community, the Mid-City Communities Plan Update encompasses Kensington-Talmadge, Normal Heights, City Heights, and Eastern Area. These four communities are very different from each other and should be considered and treated differently as they were in the previous plan in 1998. The decisions made now will shape zoning and density in these communities permanently under current state law which prohibits any future net downzoning, so it is critical to get this plan update done correctly.

The City's Draft Plan proposes major density increases, including significant upzoning within established neighborhoods, without a clear economic development strategy, population justification, emergency evacuation plan, adequate protection of Very High Fire Hazard Severity Zones (VHFHSZs) or commitments to the parks, libraries, community facilities, and other infrastructure needed to support that growth.

The elected Kensington-Talmadge Planning Group (KTPG) believes there is a better, smarter approach. Mid-City has miles of underutilized commercial and transit corridors, particularly along El Cajon Boulevard and University Avenue, where new housing and mixed-use development can revitalize our communities while putting growth where transit and services already exist.

The KTPG has developed an SB79 Alternative Plan. We believe that the most expansive requirements of SB79 are its FAR limits, more so than the du/ac requirements, and that once FARs are established that are compliant with SB79, the other factors of height and density easily fall into line.

North of Meade Avenue, the KTPG proposes keeping the existing zoning within the SB79 affected areas, but applying a 1.25 and 1.5 FAR overlay in the ½ mile zone and ¼ mile zone respectively. Done in conjunction with the Bonus ADU program, this overlay does not exceed the maximum 50% reduction and will comply with SB79. The KTPG alternative map accomplishes the goals of SB79 while providing better transitions between the new, higher density development and the existing single-family homes

Retaining the existing zoning would be more respectful of the pending Kensington Historic District which was first identified in the 1998 community plan and provide protection of our historic resources. SB79 specifically calls out historic resources and VHFHSZs for exemption from its requirements.

As agreed verbally by the planning department representatives in our September 21st public meeting, where they presented the First Draft Mid-City Communities Plan, we are requesting a meeting to discuss our proposed SB79 Alternative Plan so that we can clearly and completely communicate why we believe our plan is compliant. We look forward to working together to come up with a plan that is mutually agreeable to the City Planners and the KTPG.

A most significant issue is the failure of the draft plan to mention or include all the already existing and applicable bonus development programs. These include Bonus ADUs, Sustainable Development Areas, Transit Priority Areas, and Complete Communities Housing Solutions, etc. The Bonus ADU Program, for example, already allows up to 6 dwelling units depending on lot size for most single-family lots. The combined effect of layering these programs on one another is not shown in the draft City Plan.

The Complete Communities program is particularly egregious within our RM-zoned areas in that it allows an extra 33 feet in height where zoning is for 20 du/ac or more. This would apply to all the proposed land use categories above Residential Low 3 in the draft City Plan.

Because of these programs, what is shown in Figure 2-1 Planned Land Uses on page 13 and depicted in the Land Use Designations pictures on pages 16 to 20 in the draft plan, the 2-story attached duplexes that are pictured can be 5-story, the 3-story attached townhomes, rowhomes, attached flats, and multi-family buildings can be 6-story, and 5-story multi-family buildings can be 8-story apartment buildings. These Land Use Designations pictures are at best inaccurate and misleading and at worst disingenuous and knowingly deceptive.

What should change in the plan?

Focus new density on and near transit and commercial corridors, rather than deep within established neighborhoods.

Leave existing residential zoning intact. Bonus ADUs, SB 9, and other state and local programs already allow substantial additional housing in these areas.

Require infrastructure to accompany growth, not lag behind it, including parks, libraries, and community facilities.

Respect Kensington and Talmadge's historic resources and recognize existing State and National historic districts locally. Strongly support existing historic districts in Talmadge and proposed historic districts in Kensington by modifying the SB79 TOD Alternative plan accordingly.

Provide for adequate emergency evacuation from VHFHSZs and through adjacent areas. Kensington-Talmadge is much greater than 50% VHFHSZ.

In the following sections, references to specific pages refer to the Draft Communities Plan, or alternatively to Appendix X, the Park & Recreation Inventory.

ELEMENT 1 INTRODUCTION

GENERAL CHAPTER COMMENTS

The KTPG is concerned that the City created a system where people outside of our communities are dictating the fate of communities in which they don't live. The greater Balboa Park area was attempted as a combined plan, and failed. We believe this combined effort has similarly failed.

The draft plan states, "Mid-City is one of the oldest and most diverse communities in the City." This diversity is not being acknowledged by the broad statements being made about Mid-City. At the time of the 1998 plan, it was recognized that the four areas were very different with differing needs, and each planning area was treated differently in that plan. As was done in 1998, each of the four community planning areas should be treated differently in this current plan.

2020 Census data show that Kensington-Talmadge is a diverse community, with 52.4% of residents identifying as racial or ethnic minorities. This is an increase from 38% in 2000. The plan should explain why substantially changing existing historic single-family neighborhoods is necessary to achieve greater diversity, particularly when those neighborhoods contain a significant concentration of Spanish Colonial Revival architecture that is itself part of the diversity of the community's cultural and architectural heritage

The plan states that "Since the 1998 community plan, Mid-City has seen significant expansion of parks, schools, and other public facilities." While this may have occurred in other Mid-City communities, it has not been uniform, and certainly has not occurred in Kensington-Talmadge.

The City plan describes Mid-City as an area facing significant population growth. However, available Census data show a long-term decline in Mid-City's population since 2000. Mid-City's population was highest in 2000 and has declined by approximately 9% since then. This raises questions about the assumptions used to justify large density increases.

The plan compares Mid-City population versus housing units from 1970 to 2024 (Figure 1-3). It is important to note that while the population increased 45.0 % during this period, the number of housing units increased 49.5% from 1970 to 2024, indicating that Mid-City is making clear progress without upzoning.

However, the population increase did indeed outpace the delivery of community facilities, including schools, libraries, parks, and infrastructure by the City of San Diego.

The referenced population decline in Mid-City from 2000 to 2024 may also be explained by people moving to higher opportunity areas with better community facilities as they became more financially able to do so. It may also be partially explained by the removal of three-square city blocks of housing for the construction of elementary schools during recent decades. Cherry-picking data and blaming lack of housing units for all of the population issues described in the plan is both misleading and disingenuous.

The draft plan creates capacity for approximately 89,000 additional residents over the next 30 years. This represents a significant departure from Mid-City's recent population trends, which show a long-term decline. The plan should explain how this level of additional development capacity is justified by the City's population projections, particularly where it would result in significantly increased density and disruption in historic single-family neighborhoods.

The City points to the large number of workers who commute into Mid-City as a reason for adding more housing. The City reports that about 17,500 workers commute into Mid-City for jobs. However, a much larger number—61,025 workers—commute out of Mid-City for work. Most significantly, only a small portion of Mid-City workers—3,941—both live and work in Mid-City. If adding housing near jobs is intended to reduce commuting, the plan should explain why so many people who live in Mid-City currently commute elsewhere for work and how the proposed additional housing is expected to change this pattern.

The draft plan states that it is a result of extensive community engagement. In actuality, most of the community members in Kensington and Talmadge are largely unaware of the plan update or even that there is a community plan for land use and development. In addition, the new "working group" process minimized and restricted the role of the elected community planning groups, who are most familiar with the needs of the community.

The Mid-City Plan states that local communities have and will be consulted on changes. However, several significant decisions affecting Kensington-Talmadge have not reflected the views expressed by the community.

The composition of the Mid-City Plan Working Group raises questions about how well Kensington-Talmadge residents were represented in decisions affecting the neighborhood. The 16-member Working Group was designed to represent all four Mid-City communities, with only three seats associated with Kensington-Talmadge. This allowed a majority of the working group to push out-sized density into communities which simply did not have the votes to counter this abuse. As a result, the Working Group ranked Concept 2 highest overall, while the Kensington-Talmadge Planning Group supported Concept 5. Concept 5 focused on concentrating up zoning along transit corridors while preserving single-family homes.

COMMENTS, QUESTIONS & EDITS

1Q-1: Under "Homes", the document states, "6260 homes built in the past 20 years". Is this a net number or a gross number? Does that number take into account the homes that had to be demolished to build new schools? (Page 8)

1C-1: Under "Community Engagement" much is made of the broad spectrum of engagement that occurred. However, there appears to be a strong disconnect between the input received through the planning department engagement process and what the Kensington-Talmadge planning group found through its online community poll about 'corner stores'. The Planning Department found broad, nearly universal support for corner stores, while the online poll found only 12% support. Additionally, when flyers were recently distributed to the community,

informing them of the in-process community plan update, and September 2026 planning department presentation, a broad majority of people had no idea this was happening. This lessens the department's credibility regarding their community engagement process. (Page 10)

ELEMENT 2 LAND USE & ECONOMIC PROSPERITY

GENERAL CHAPTER COMMENTS

Figure 2-1 should be modified to change proposed land uses in several areas. The 4400 block of Euclid Avenue should be changed to a commercial district. The "Sustainable Communities section (Page 57) states that the Community Plan focuses on reducing reliance on cars. This supports the development of Euclid Avenue as a commercial district. The current zoning of the 4500 blocks of Talmadge within the Historic District should remain unchanged to protect the communities' historic resources.

The City proposes that large portions of Kensington-Talmadge be rezoned for higher-density residential development. The area between Adams Ave and El Cajon Blvd from I-15 to Fairmount, as well as part of Kensington Village, is proposed for substantially higher residential density. Based on our review of the proposed zoning combined with current zoning and state and city bonus programs, buildings of roughly 6–8 stories would be possible.

On page 13, the proposed zoning maps show base zoning, but they do not show the full range of development that could be permitted through other applicable programs. For example, zoning that allows 20 du/ac or more may be eligible for additional development through programs such as Complete Communities. The proposed zoning would substantially increase allowable residential density and, when combined with other applicable development incentives or up-zoning programs, could allow buildings substantially larger than the existing neighborhood pattern.

On page 14, the plan proposes transition zoning to provide a gradual change between higher- and lower-density areas and, on paper, to soften the impact of higher-density development on single-family neighborhoods. However, in practice, transition zoning can extend higher-density development further into existing single-family neighborhoods. When combined with other development programs, this could allow large buildings next to single-family homes—the opposite of the intent of transition zoning. (Page 14)

Responsible development is an important community need. Housing goals should be balanced with infrastructure capacity, transportation, fire safety, parking, historic resources, and the existing neighborhood context

Table 2-3 Relevant General Plan Properties supports that Mid-City is a diverse community, supports both the goal of no corner stores, and supports a neighborhood serving commercial

district on the 4400 block of Euclid Avenue. It further supports the need for community parks and infrastructure.

The plan emphasizes economic development and local businesses as important anchors of the community. However, it does not expand the Euclid business corridor to serve the Talmadge area, as residents have requested. In addition, parking meters were installed along Adams Ave and around Kensington Park despite local opposition. The added parking costs raise concerns about the impact on local businesses and access to the park and library, particularly for lower-income residents.

COMMENTS, QUESTIONS & EDITS

2C-1: Under "Goals", 4th bullet point, the plan states a goal of "Affordable Homes are Abundant & Preserved". However, the zoning plan within our historic districts targets our most affordable homes for redevelopment and does not preserve them. Therefore, the City is removing the most affordable first rung of home ownership. (Page 12)

2C-2: Under "Vision" the plan states that corner stores were broadly supported in all residential zones, in all communities. However, one simple online poll in Talmadge showed only 12% support for corner stores in that community. We question the accuracy of that statement, and the efficacy of the City's community engagement process, particularly for Kensington and Talmadge. (Page 12)

2C-3: Under "Transitions", the description and visual examples of transitions is not valid given the ability to apply multiple bonus programs to the same development. (Page 14)

2C-4: Under "Anti-Displacement and Affordable Housing," the new housing that most effectively prevents displacement is along El Cajon Boulevard where housing currently doesn't exist. (Page 14)

2E-1: Modify "Anti-Displacement and Affordable Housing" as follows:

> The potential for displacement of existing community members must be addressed when planning for additional growth. Displacement can occur when new developments ~~wealthier residents~~ and/or businesses ~~move to~~ are built in an older community, which can increase property values and the cost of homes and rents. (Page 14-15)

2E-2: Add a table of all bonus programs which may be layered on top of existing zoning, showing density, height and FAR, and in which zoning ranges they are applicable. (Page 15)

2E-3: In Figure 2-1, provide additional visual examples of developments that include application of all bonus programs. (Page 16 – 23)

2Q-1: The City seeks to avoid over-concentration of affordable housing. How does the City define "over-concentration" of affordable housing? (Page 15).

2Q-2: Are the City's inclusionary housing regulations applied on a community planning area basis, or by the community plan? (Page 15)

2E-2: Given that Community Plan Policy 2.2 is based upon a false impression that corner stores are universally supported, modify 2.2 as follows:

> Support corner stores, markets and neighborhood-serving retail uses to encourage accessibility to services only within residential areas where there is demonstrated community support. (Page 34)

2Q-3: In Community Planning Policy 2.6, the City envisions supporting the preservation and renovation of culturally and historically significant residential units in a sustainable manner. How does the City's maximalist implementation of SB79 by upzoning within historic district areas support this? (Page 34)

2E-3 Modify Community Planning Policy 2.8 to include a metric which defines over-concentration of affordable housing. (Page 34)

2Q-4: In order to implement Community Planning Policy 2.16, what Mid-City specific policy does the City propose to achieve their goal of equitably distributed affordable housing within Mid-City? (Page 35)

2Q-5 In order to implement Community Planning Policy 2.17, what specific changes is the City envisioning? Why would these only apply to Mid-City and not citywide? (Page 35)

ELEMENT 3 HISTORIC PRESERVATION

GENERAL CHAPTER COMMENTS

On page 37, in reference to "Goals" the first bullet point states that "Significant historical resources are identified, preserved and celebrated as part of Mid-City's evolving community fabric." This is not supported by the draft plan's policies which are eating away at the historic districts of Kensington and Talmadge.

On page 37, in reference to "Vision" it states that "The Community Plan…celebrates significant and important historical resources and balances historic preservation with new development." The building of compatible ADUs behind an existing historic house strikes appropriate balance between new development and historic preservation. The construction of an apartment building next door does not balance historic preservation with new development.

On pages 37 and 52, under section HP-A.5b, the plan's proposed zoning should be reviewed alongside the City's historic preservation work in Kensington-Talmadge. The City's historic survey has identified Kensington Park, Kensington Manor & Heights, and Talmadge Park as potential historic districts. The proposed density changes could significantly change the character of these areas and should be evaluated in the context of the plan's stated historic preservation goals.

The City should take full advantage of the state's allowance for a SB79 Alternative plan to protect Monroe Avenue to Adams Avenue to the maximum extent possible, as proposed by the Kensington-Talmadge Planning Group.

COMMENTS, QUESTIONS & EDITS

3E-1: Edit Resource Identification and Preservation for clarity as follows:

"The Mid-City focused reconnaissance survey identified four new potential historic districts, including two residential districts in the Kensington area (Kensington Park; Kensington Manor and Heights~~, Kensington Park~~), one residential district in the Kensington and Talmadge area (Talmadge Park), and one commercial district in Normal Heights on Adams Avenue (Carteri Center). A focused reconnaissance survey is not the final survey. An intensive level survey would need to be done before any Mid-City historic districts are designated by the City."

ELEMENT 4 SUSTAINABILITY, EQUITY, RESILIENCE AND CONSERVATION

GENERAL CHAPTER COMMENTS

On page 63, under "Fire" that document states the need for additional fire resources to maintain adequate fire services in Mid-City depending on the amount of future development. Much more than 50% of Kensington-Talmadge is in the VHFHSZ with many brush-covered hillsides and canyons that increase the risk of fire. Increased density and much taller buildings will make it more difficult or perhaps even impossible to effectively respond to fires. The existing hydrants and water mains may not be able to provide adequate flows and pressures to fight fires in tall apartment buildings that are located in single-family neighborhoods. These additional fire resources must precede or at a minimum accompany increased density and development.

There is also the heightened concern that evacuees and emergency responders will be traveling not only through the VHFHSZs but also must travel through the adjacent highly densified SB79 areas. An updated and adequate emergency evacuation plan that takes all the above concerns into account must be part of the community plan to ensure public safety.

COMMENTS, QUESTIONS AND EDITS

4E-1: Add under Urban Forestry and Greening, as follows:

> Street Tree Corridors identifies primary street trees for major corridors in Mid-City. The Street Tree Plan further identifies secondary and accent street trees, as shown in Figure 4-2 and Table 4-1. Alternative street tree selections may be allowed with City approval. (Page 64)

4C-1: The legend for Figure 4-3 appears to conflate Open Space with Park Space, and the two are not the same. And the color shown on the legend for Open Space is somewhat different from the green shown in the figure. (Page 70)

4E-2: Remove the "Open Space" designation from the legend. (Page 70)

4E-3: Edit Community Planning Policy 4.19 as follows:

> ~~Promote~~Provide adequate water supply, flow rate, and duration levels - and ensure proper spacing and Draft readiness of fire hydrants - to support effective fire suppression. (Page 78)

4E-4: Add new Community Planning Policy 4.25 under "Flooding" as follows:

> Prioritize improvement of existing stormwater facilities to manage urban street runoff where flooding of streets and adjacent property currently occurs. (Page 79)

ELEMENT 5 URBAN DESIGN

GENERAL CHAPTER COMMENTS

Missing Middle Housing refers to a range of multi-unit residential buildings, such as duplexes, triplexes, and fourplexes, that are compatible in scale with single-family homes. This type of housing is supposed to provide a transition between single-family homes and larger apartment complexes. The draft community plan in its current form does not provide an appropriate transition in its proposed land use map. The proposed land use adjacent to single-family homes is overly dense and overdeveloped. This situation is exacerbated by the existing state and city bonus programs that will create nightmare situations for neighboring single family homes analogous to what occurred with the City's Bonus ADU program. In this case, it will not be an unforeseen result as we have already seen it happen.

Many of the qualities the City wants in a well-planned community and is attempting to replicate or reintroduce elsewhere, already exist in Kensington-Talmadge. Its single-family neighborhoods, tree-lined and winding streets, historic character, small business district, and community gathering places make it distinctive. Replacing parts of these neighborhoods with larger apartment buildings could undermine the qualities that make the community special.

COMMENTS, QUESTION & EDITS

5C-1: On the legend in Figure 5-1, the combination of "Existing and Proposed Parks and Open Space", shown in one color green, gives a false impression that there would be far more park space than is actually possible. We can not overstate how misleading this map is in its current form. (Page 83)

5E-1: Modify Figure 5-1 to separate "Existing and Proposed Parks and Open Space" into two categories "Existing and Proposed Parks" and "Existing and Proposed Open Space" with different, clearly distinguishable colors. (Page 83)

5E-2: Modify "Alleys" as follows:

Alleyways ~~are often~~which are underutilized, and where appropriate, ~~spaces that~~ can be transformed into vibrant green corridors, serving as valuable connectors within neighborhoods as long as basic functions are maintained, such as waste management, parking and garage access, utility easements, and deliveries. Green alleys integrate stormwater management, urban greening and cooling, safety and connectivity. (Page 87)

5Q-1: Does the westward expansion of the Little Saigon Cultural and Commercial District encompass Hoover High school? (Page 88)

5C-2: While current policies and municipal code promote the activation of our main commercial corridors, such as El Cajon Boulevard, many new businesses comply with the code by installing a primary door on the main street frontage and then keeping it locked. (Page 112)

5E-3: Combine and replace Community Planning Policies 5.12 & 5.13 as follows:

Support building design that promotes placement of windows and primary doors to enhance visibility and provide passive surveillance of streets and public spaces. To promote these goals, require that primary doors are accessible during regular business hours, facing the main commercial corridor. (Page 112)

5E-4: Add language under "El Cajon Boulevard & 54th Street" as follows:

El Cajon Boulevard Transit Corridor at 54th Street is focused around the "Crawford Cluster" of three schools, access to Colina Del Sol from south 54th Street, and the gateway to the College Planning Area to the northeast. Given the area's many uses, it can accommodate high mixed-use densities near high-quality transit, including the extension of the bus-bike lane. This study would incorporate bike, transit, and streetscape improvements to complement the high active transportation propensity. To promote walkability, each quadrant defined by the intersection that will be encompassed by new development, should be walkable within itself. (Page 95)

5C-3: The policies of 5.73 should apply to all streets. (Page 117)

5E-5: Modify Community Planning Policy 5.73, under "Transit Villages, Corridors and Main Streets" as follows:

> Underground utilities to reduce conflicts with pedestrian movement where possible. When located above grade, locate utilities outside of the sidewalk pedestrian areas to allow for a clear path of travel wherever possible. For other streets, see Community Planning Policy 7.29 (Page 117)

ELEMENT 6 MOBILITY

GENERAL CHAPTER COMMENTS

The draft plan classifies Kensington-Talmadge as a transit neighborhood and describes the area as a bus/bike-to-work community served by public transportation. This statement is aspirational at best. The Route 11 bus does not travel to where most of the jobs are now located in North County without a transfer or multiple transfers. A 1-1/2 to 2- hour commute to and from work is not practical. Biking to work is not safe or practical for a commute to where most jobs are now located

The plan does not provide clear evidence that a large increase in Mid-city residential density without adequate parking will result in a large shift from automobiles to public transportation or biking. The plan includes proposals for additional trolley service via the Purple Line, an added bus lane on El Cajon Boulevard, as well as the transition of Route 11 into Rapid Route 211. These are aspirational future projects that most probably will never be funded or built especially given recent proposals by MTS to substantially reduce services. They should not be treated as existing transit service when justifying the amount of additional housing the area can support. The additional proposed housing should coincide with, or better, be preceded by the additional transit.

Currently, congestion on side streets, combined with numerous parked cars, can restrict two-way traffic, requiring vehicles to pull over to allow oncoming traffic to pass, and hinder emergency services and public evacuation. Parking meters on Adams Avenue has made the parking issues worse as people park on the neighboring streets to avoid paying the parking fees. Because new high-density development south of Adams can be approved with substantially reduced or no minimum automobile parking requirements, parking issues will worsen in this area.

COMMENTS, QUESTIONS, & EDITS

6Q-1: Figure 6-1, the path/trail which circumnavigates Kensington thickens in color along Aldine Drive. Can you clarify what is being proposed. The graphics are unclear. (Page 120)

6C-1: Figures 6-1 and 6-2, the Aldine Drive bicycle and pedestrian paths should be separated from the roadway as we mention in a comment for Chapter 7 (7E-17). (Pages 120, 122)

6E-1: Figure 6-1 Change pedestrian path along 4400 Block of Euclid Avenue from green "connector" to blue "corridor" to coincide with the proposed zoning change to Neighborhood Commercial. (Page 120)

6Q-2: Figure 6-2 shows a Class III Enhanced Bikeway along Monroe Avenue. Is the City anticipating installation of roundabouts on Monroe Avenue? Something else? Something more? (Page 122)

6C-2: We are very concerned about developing an entire community plan based upon the proposed Purple Line trolley that lacks funding under any current funding scenarios. (Page 123)

6C-3: Bus 211 is not in the planned transit facilities legend so it should not be on the map. Also, Adams Avenue lacks road width to support a Rapid Bus, or Rapid Bus Transit. (Page 124)

6C-4: Figure 6-4, reducing El Cajon Boulevard to two lanes (one each way) is inadequate to the task of transporting 35,000 ADTs. We are opposed to reducing El Cajon Boulevard to two lanes which will divert traffic onto residential side streets. (Page 127)

6E-2: Figure 6-4, modify to include a more expansive legend that defines all symbols and acronyms. (Page 127)

6C-5: Community Plan Policies 6.9, we are concerned that these changes will divert traffic into the neighborhood, as well as push business parking into the residential areas. (Page 132)

6E-3: Modify Community Plan Policy 6.15 as follows:

Manage the supply of on-street parking within business districts while balancing the need for sidewalk and bicycle improvements. Consider implementation of a residential neighborhood permit parking system that does not dispense more permits than available parking. (Page 133)

6E-4: Modify Community Plan Policy 6.3 as follows:

Encourage mobility improvements that support walking and rolling to everyday needs such as stores, schools, parks, and other neighborhood-serving destinations to promote neighborhood interconnection. Provide pedestrian pathway along the north side of Aldine Drive between Kensington and Talmadge, via a cantilevered structure separated from vehicular traffic. See our edit 7E-17. (Page 132)

6E-5: Modify Community Plan Policy 6.19 as follows:

Consider and evaluate new pedestrian and bicycle bridges across canyons or ~~across~~ freeways connecting Mid-City to neighboring communities. (Page 133)

ELEMENT 7 PARKS & PUBLIC FACILITIES

GENERAL CHAPTER COMMENTS

The Mid-City Plan proposes large increases in housing density. The plan does not, however, clearly state if or how needed infrastructure improvements will be funded, when they will be completed, and whether they will be in place as new development occurs.

How will the City provide the additional park and recreation facilities needed to support the plan's substantial increase in development capacity if none of the identified solutions, for example the Teralta freeway-lid expansion, have a funding commitment or established construction cost? This is particularly significant given the historical record of park and recreational goals not being fully implemented. All avenues of land acquisition should be explored.

Some proposed public facilities and open-space improvements rely on privately owned public spaces, where private developers would provide and maintain facilities that are publicly accessible. How will the City ensure that needed public facilities are provided if new housing is built mostly in non-CEOZ areas and not in CEOZ areas where these facilities are required?

Kensington-Talmadge has narrow residential streets, steep slopes, and canyons that can create challenges for emergency access, fire response, and evacuation. The Mid-City Atlas identifies a large majority of Kensington-Talmadge within Very High Fire Hazard Severity Zones. The plan should identify what fire-safety and emergency-access improvements will be needed to support the proposed increase in residential density, whether those improvements are feasible, and what milestones will ensure they are completed before development that depends on them is allowed to proceed.

COMMENTS, QUESTIONS, & EDITS

7Q-1 The document discusses existing, planned, proposed, and potential park facilities. What is the difference between planned, proposed, and potential park facilities? (Pages 138-139)

7E-1: Include a definition of existing, planned, proposed, and potential park facilities.

7E-2: We believe the existing and aspirational park points should be clearly and separately quantified. The majority of the added park points are not achievable and should not be described with the certainty that the adjective “planned” gives to them. These edits should be made as follows (Page 138):

> Parks
> The Parks Master Plan standard of 100 Recreation Value Based points per 1,000 community members results in the need for approximately 22,700 Recreation Value Points based on the projected population of 227,000 people at full community buildout. The Community Plan identifies opportunities for parks over the planning horizon. The Community Plan identifies approximately ~~11,870.75~~ 6198.5 existing and 5672.25 ~~planned~~

potential Recreation Value Points, as shown in Table 7-1. New development and other future park opportunities could provide an additional 10,830 Recreational Value Points to ensure public benefit is provided as Mid-City grows.

7C-1: Mid-City has many existing, proposed, and potential parks shown in Figure 7-1 (page 139). However, these existing, planned, and potential parks are unevenly distributed between the four planning areas which already have a great disparity in park points, with the proportion varying from 8% to 77% of the standard. Table 7-1 (page 140) amalgamates this data inappropriately, and obscures the disparity between the four planning areas. This data should not be buried in an appendix that decision makers may not review.

7E-3: Separate the data within Table 7-1 among the four community planning areas. (Page 140)

7C-2: Combining park point totals into one number only serves to hide the depth of the current deficiency. Additionally, many of the potential park facilities are so unrealistic that they should be listed in a new category titled "aspirational" so as not to be confused with something that could actually be built. (Page 140)

7E-4: Modify "Small and Non-Traditional Space" as follows:

To meet the need for more recreational spaces, the Community Plan identifies small and non-traditional areas as potential opportunities for additional public parks such as ~~including~~ excess or eligible rights-of-way, ends of streets and smaller undeveloped lots. However, their purpose should be to supplement more traditional parks, as opposed to replacing them. (Page 140)

7E-5: Modify "Access to Parks & Recreational Facilities" as follows:

Ensuring equitable access to parks and recreation facilities is a central goal of the Parks Master Plan, which calls for prioritizing park investments in areas with limited recreational opportunities and should be given greater weight within the prioritization process. Every proposed, planned, or potential park within this document should be evaluated and scored via Council Policy 800-14 and other internal City processes within 3 years of adoption of this plan, and the score should be kept on file for future implementation opportunities. (page 140)

7Q-2: Is Appendix X (referenced on page 141) the Park & Recreation Inventory document which is available on the City's website for the Mid-City Communities Plan related documents?

7E-6: If yes, then we make the following comments and edits to Appendix X and the Park & Recreation Inventory:

(The following comments refer to Appendix X, Park & Recreation Inventory)

General Comment: We believe that listing specific amenity additions creates the impression of having taken input and come to a community consensus which has not occurred. For example,

recently proposed design improvements for Ward Canyon Park were not widely disseminated to nearby communities until nearly complete.

TERALTA PARK NORTHERN EXPANSION (Freeway Lid parks)
7C-3: UNREALISTIC due to cost and need for outside funding.

7E-7: When breaking apart the potential park scores for the planning areas, 1/3 of the points for the Teralta Park Northern Expansion points should be assigned to Kensington-Talmadge.

KENSINGTON NEIGHBORHOOD PARK

7C-4: POSSIBLE As mentioned above, specific amenity additions should not be included since they have not been vetted through a public input process.

7E-8:

Park is located on Adams Avenue in Kensington and shares its site with the Kensington-Normal Heights Branch Library, which is recommended for ~~replacement~~ relocation with a new facility in the City's Vision 2040 Public Library Master Plan. The park is directly accessible from the Adams Avenue bus stop. Existing amenities include seating and picnic tables, large specimen trees and palms, a play area, and a multi-purpose turf area.

Future improvements to include amenities and upgrades guided by a community input process. ~~such as a bocce ball court or similar recreational feature, an expanded play area, a community garden, and a public art or placemaking element. Additional upgrades~~Any future improvements shall be implemented in coordination with ~~the~~a future library ~~replacement~~ relocation as outlined in the Public Library Master Plan.

TERRACE COURT PARK

7C-5: UNLIKELY. The expansion requires buying the property from Caltrans.

7C-6: POSSIBLE. It's possible to add amenities to this location, and that some of the ideas proposed for the Kensington Neighborhood Park could be located here if the community input process supported it.

7E-9:

Possible ~~Expand~~expansion south toward Adams Avenue to create additional programming space, including removal of bollards and parking reconfiguration along Terrace Drive. Future improvements to be determined through a community input process. ~~include features such as a children's play area, fitness stations, a shade pavilion with seating, public art and placemaking elements, and a wayfinding signage system.~~

ALDINE DRIVE POCKET PARK

7C-7: UNREALISTIC due to location and potential need to construct retaining wall to create usable land.

7E-10: Delete entirely because high ADT count makes the location undesirable.

MIRACLE DRIVE PARK

7C-8: POSSIBLE.

7E-11:

Develop a park, to include partial street vacation of west side of Miracle Drive, with facilities such as canyon-side overlook seating, wayfinding signage, and interpretive/educational elements, or potential children's play area as determined by a community input process. The park could evolve into a trailhead pocket park should future trail plans in the open space be proposed and implemented.

MONROE PARK

7C-9: POSSIBLE. However, note that the location may require construction of a retaining wall.

7E-12: For clarity, rename this site "Max & Monroe"

7E-13: Develop a park with facilities such as ~~a children's play area,~~ overlook seating with views into the adjacent canyon, a shade pavilion, and wayfinding signage as determined by a community input process.

ADAMS AVENUE PARK

7C-10: POSSIBLE.

7E-14: For clarity rename this site as Adams & 51st

7E-15: Edit as follows:

Design and construct a park with facilities such as shaded seating, ~~a walking path~~, a fitness element~~, an open lawn~~, and a placemaking element as determined by a community input process.

MEADE AVENUE PARK

7C-11: POSSIBLE.

FRANKLIN ELEMENTARY JOINT USE PARK

7C-12: POSSIBLE.

7E-16: Correct the area calculation. The park inventory identifies a size of 1.45 acres when the actual size is approximately 1.20 – 1.25 acres.

ALDINE DRIVE TRAIL

7C-13: POSSIBLE given that the privately owned lots are vacant.

7E-17:

Establish a recreation easement to create an approximate 1/4-mile cantilevered trail segment along Aldine Drive with a trailhead entrance ~~at Aldine Drive,~~ connecting to the proposed Kensington Loop Trail. Amenities include a formal trailhead with wayfinding signage and seating.

KENSINGTON LOOP TRAIL

7C-14: UNREALISTIC. ALL of the private property owners along the potential alignment of the trail would have to grant easements for it to be viable and usable.

(The comments below now return to the Mid-Cities Draft Communities Plan)

7Q-3: The "Community Enhancement Overlay Zone and Additional Recreation Access" offers increased development allowances to developers in exchange for publicly accessible open areas and recreational amenities. We would like to know how much more in density/FAR benefits does a developer get by implementing the CEOZ versus utilizing Complete Communities? It should be noted that the requirements of Complete Communities can be converted into a fee that can be spent elsewhere for other purposes. (Page 142)

7C-15: The vision of the Library Master Plan is to relocate the substandard Kensington-Normal Heights library located in the Kensington Neighborhood Park. This vision is supported by proposed Community Plan Policy (Public Facilities) 7.9.

7E-18: Modify the "Libraries" section as follows:

The Library Master Plan provides a long-range vision and strategy for the modernization and investment of the City library system, addressing the need for community meeting rooms, modern information technology, and activity spaces, as well as needed building repairs and upgrades. To further the vision of the master plan, relocate the Kensington-Normal Heights library to a commercial site along Adams Avenue in Normal Heights and repurpose the former library building into a multi-purpose community space. (Page 145)

7C-16: Under “Public Utility Services”, There are areas in Kensington-Talmadge where the street lighting has failed completely and no longer functions. (Page 146)

7C-17: Some stormwater facilities are inadequate to prevent flooding of streets and private property from street runoff. (Page 146)

7C-18: Current lighting in much of Kensington-Talmadge does not meet the established standard for an urban area, and should be upgraded. This should occur with the undergrounding of utilities as per current City undergrounding policy. (Page 150)

7E-19: Modify Policy 7.5 as follows:

Replace, expand and upgrade public facilities and infrastructure as needed to meet adopted city standards and to maintain service levels that address community needs and enhance safety and environmental performance (Page 150)

7E-20: Modify Community Plan Policies “Public Facilities” as follows:

7.13 ~~Encourage c~~Community participation in the planning, design, and improvement of parks and community facilities shall be required and include adjacent community planning areas which will utilize the facilities. (Page 151)

7E-21: Add proposed “Community Plan Policy” under “Public Facilities” as follows:

Provide stormwater facilities that accommodate existing and proposed development to prevent flooding of private property, streets and other public rights-of-way, and promote public safety. (Page 151)

7E-22: Add proposed “Community Plan Policies” under “Libraries” as follows:

Relocate the Kensington-Normal Heights library to a commercial site along Adams Avenue in Normal Heights and repurpose the former library building into a multi-purpose community space. (Page 152)

7E-23: Modify Community Planning policy 7.29 as follows:

Prioritize the undergrounding of overhead electrical and communication wires to remove all utility poles and wires from canyons, private property, alleys, and sidewalks. The new, above-grade utility boxes should not be placed within pedestrian rights-of-way nor create new obstructions, ~~in high foot traffic areas,~~ especially in pedestrian districts and corridor route types and along commercial corridors. (Page 152)

ELEMENT 8 IMPLEMENTATION

GENERAL CHAPTER COMMENTS

None.

COMMENTS, QUESTIONS, & EDITS

8C-1: City is proposing to create a Community Enhancement Overlay Zone that will require private investment and owners to build, maintain, and operate public infrastructure on private land along our main business corridors. See also our Chapter 7 General Comment for further elaboration. (Page 153)

8Q-1: Why does the City believe that these costs and legal liabilities will not drive new development away from the corridors and into the neighborhoods where these added costs and legal liabilities are not required? This would add residents without development of any needed community amenities, and retard development of the corridors where redevelopment is actively being sought. In other word, the choice will become "There are two pieces of property, appropriately priced for their development capacity. One requires an added, unknowable future legal risk, and the other does not. Which one should I choose?" (Page 153)

8C-2: Capital Improvements are prioritized using a scoring matrix broadly described in Council Policy 800-14, and more finely developed within Engineering and Capital Projects (EC&P) Department that was only publicly disclosed earlier this year (2026). To lessen the workload for E&CP, not all projects are forwarded by asset-owning departments to E&CP for scoring. Therefore, many projects that would score high, higher than many projects that are actually funded, do not receive consideration for funding or are even acknowledged within the process that they are high-scoring, meritorious projects. (Page 153)

8Q-2: What will this plan do to overturn this discriminatory, internal practice? (Page 153)

8E-1: Describe in the plan, CEOZ Subareas A, B, and C that are shown on Figure 8-1. (Page 154)

Appendix A

Errata

Page 4	**Introduction, Purpose**, line 4, misspelled “Talmage”
Page 16	**Figure 2-2**, Land Use Designations, mislabeled as “Figure 2-1”.
Page 26	**Table 2-2** doesn’t list the five Kensington MADs. There is no “Table 2-1“.
Page 28	**Figure 2-4** doesn’t show the five Kensington MADs
Page 31	**LU-H.10 (g)**, formatting error
Page 70	**Figure 4-3,** delete “Open Space” designation from Legend. See comment 4E-2.
Page 71	**Chollas Creek Watershed,** line 3, misspelled “Talmage”
Page 71	**Chollas Creek Watershed**, line 3, add “and” before Encanto
Page 85	**Canyon and Open Space Interface,** line 12 (last line) add “.”
Page 109	**UD-B.1 (d)(2)** extra spaces and commas.
Page 112	**Building Form and Scale** 5.3, “vary” s/b “variety of”
Page 123	**Transit Lanes**, formatting error
Page 143	**Figure 7-2**, Fairmount Avenue, between Kensington and Talmadge shows an extra bus stop that does not exist
Page 143	**Figure 7-2**, no station numbers shown for Normal Heights and City Heights fire stations 17 and 18
Page 143	**Figure 7-2**, on Estrella Avenue, America’s Finest Charter School has closed
Page 152	**7.26**, delete “the” before “library branches”

NHCPG Comments on the Mid-City Communities Plan Update First Draft

Normal Heights Community Planning Group

chair@normalheightscpg.org · (626) 390-4190

October 23, 2026

City of San Diego City Planning Department

Re: Normal Heights Community Planning Group Comments on the Mid-City Communities Plan Update First Draft

Dear City Planning Staff:

On behalf of the Normal Heights Community Planning Group, which voted unanimously at its October 13, 2026 meeting to submit these comments, we write regarding the First Draft of the Mid-City Communities Plan Update. Normal Heights supports new housing and the revitalization of our neighborhood, however, the 1998 Mid-City Communities Plan established a goal of ensuring that adequate public facilities would be available as additional multifamily development was permitted. The First Draft nearly triples maximum residential density, from 75 to 218 dwelling units per acre, without corresponding commitments to parks, library services, mobility, water and sewer infrastructure, or public safety. A plan that will guide our community for the next 30 years should match growth with the facilities needed to support it.

We previously noted concerns about the process and a need for advisory work to be conducted through the recognized planning groups. The planning department has addressed these concerns in their follow for input on the First Draft. This letter is part of that input. Economic development, a critical gap in the draft, is being addressed in a separate white paper being submitted by Normal Heights for Smart Growth 501(c)(3).

1. Present all data and goals by Community Planning Area

Normal Heights, Kensington-Talmadge, City Heights, and the Eastern Area are each represented by a separate community planning group, and each group tracks its community's needs, goals, and progress independently. The Mid-City plan combines the four areas for efficiency in preparing the document, but the combined figures do not allow any single community to measure what the plan provides for it. We request that every chapter of the plan include a sub-chapter for each Community Planning Area, presenting all metrics, targets, and implementation actions at that level, including population and housing projections, recreation needs and Recreation Value Points, library and school facilities, infrastructure capacity, mobility projects, and public safety. Without this breakdown, Normal Heights cannot evaluate whether the plan meets its future needs.

2. Include a full, itemized financing plan

The 1998 plan contained an itemized Financing Plan identifying $417.7 million in public facility needs, including $221 million for parks, $117 million for schools, $46 million for streetscape improvements, $20 million for transportation, and $13 million for libraries, along with named funding mechanisms such as impact fees, school bonds, and redevelopment tax-increment financing. The First Draft contains no equivalent cost table, no dollar figures, and no financing plan, even as it nearly triples allowable density. Development capacity is being raised without a matched, quantified commitment to public investment.

This concern is grounded in experience. The community needs identified by Normal Heights over many years have largely gone unaddressed through the Development Impact Fee and Capital Improvement Program processes, and many of the deficiencies listed in the 1998 plan remain today. We request that the plan include a full, itemized financing plan comparable to the 1998 plan, identifying the cost of each needed facility, its funding source, and its timing, broken out for Normal Heights as requested above.

3. Credit only identified, funded park projects toward the recreation target

The 1998 plan measured park adequacy by acreage. The First Draft replaces this with a Recreation Value Points system and meets its long-term target of 22,700 points only by crediting 10,829 points, nearly half the total, to undefined "potential" new development

and future opportunities with no identified sites or funding. By the draft's own figures, only about 45 percent of current recreation need is met today. We request that the "potential" category be removed from the credited total, and that the plan identify specific sites and funding sources for every point needed to reach the target.

We also request that the plan revise the Recreation Value Points rubric so that points reflect the actual value of a facility to the community, and that joint-use agreements be enforced so that public access matches the points credited. For Normal Heights, specific opportunities include a freeway lid park over SR-15, a new park in the southwest area of the community that lies more than half a mile from green space, island parks on wide streets where removed curbside parking has created heat islands, community gardens, and improved canyon trails with brush management and invasive species removal.

4. Use mandatory language for core commitments

The 1998 plan used "shall" 12 times, tied to concrete physical standards such as "Building heights shall not exceed 65 feet." The First Draft does not use "shall" once, relying instead on discretionary terms such as "can" (143 instances) and "support" (136 instances). Comparable community plans in Los Angeles and Sacramento retain "shall" even in guidance-level policies. Discretionary language leaves residents with no assurance that the plan's goals will be carried out. We request that the plan use "shall" for its core commitments, at minimum: the funding and delivery of public facilities, the reporting of all metrics by Community Planning Area, and park and recreation standards.

5. Address the deficiencies identified in 1998

Many of the needs the 1998 plan identified for Normal Heights remain unresolved after 28 years, and several have grown more urgent. Normal Heights still has no library; its library service has not conformed to General Plan standards since 1984, and the 1998 plan's recommendations were never implemented. Potential sites include the Vons redevelopment, 35th Street and Adams Avenue, and Cherokee Avenue and Adams Avenue. The community now has an estimated 42 miles of broken sidewalks with over 400 specific points mapped and documented. Street trees remain inadequate, contributing to heat and reducing walkability. Speeding and cut-through traffic continue to disrupt residential streets, particularly along Adams Avenue, at the five-way intersection of East Mountain View Drive and 35th Street, and on 39th Street south of Adams during the morning commute. Park space remains deficient, as described above. Other issues identified in 1998, including commercial parking overflow, fire risk on the Mission Valley

slopes, deteriorating water and sewer lines, and inadequate streetlights, also persist. With density set to nearly triple, the plan must include specific, funded actions to resolve these deficiencies.

6. Apply moderately lower densities on residential streets

Normal Heights supports concentrating new housing along its commercial and transit corridors, including Adams Avenue and El Cajon Boulevard, where transit service, shops, and services can absorb growth. The interior residential streets are a different setting. They are lined largely with single-family homes and small multifamily buildings on narrow lots, many from the early twentieth century, and are served by aging water and sewer lines, broken sidewalks, and limited parking. Applying corridor-level densities to these streets would place the greatest burden on the infrastructure least able to carry it and erode the neighborhood character the plan elsewhere seeks to preserve. We request that the plan apply moderately lower densities on residential streets than on the corridors, with a graduated transition between the two, so that growth is directed where facilities and transit can support it.

7. Complete a comprehensive inventory of historical resources

Normal Heights contains a substantial stock of early twentieth-century homes and commercial buildings, including Craftsman and Spanish Revival architecture, and portions of the community lie within or near historic districts. The First Draft does not include a comprehensive inventory of these resources, so the proposed land use changes cannot be evaluated for their effect on them. We request that the City complete a comprehensive historical resources survey of Normal Heights, identifying eligible individual resources and potential historic districts, and that the results inform the land use map before the Final Draft. The plan should also include design standards that restore the historic streetscape and reduce the fragmentation of existing districts.

Summary of requests

1. Present all data, goals, and implementation actions in a sub-chapter for each Community Planning Area throughout the plan.
2. Include a full, itemized financing plan identifying the cost, funding source, and timing of each needed facility.

3. Remove the "potential" category from credited Recreation Value Points, and identify specific sites and funding for every point needed.
4. Use "shall" for commitments on facility funding and delivery, reporting by Community Planning Area, and park standards.
5. Include specific, funded actions to resolve the deficiencies identified in 1998.
6. Apply moderately lower densities on residential streets than on the commercial and transit corridors, with a graduated transition between them.
7. Complete a comprehensive historical resources survey of Normal Heights and use it to inform the land use map before the Final Draft.

The full list of 57 community needs collected by the Normal Heights Community Planning Group is attached as Appendix A. We look forward to discussing these comments with City Planning before the Final Draft is prepared, and thank you for your consideration.

Sincerely,

Paul Coogan Chair, Normal Heights Community Planning Group
chair@normalheightscpg.org · (626) 390-4190

cc: Councilmember Sean Elo-Rivera, Council District 9

Appendix A: Normal Heights Community Needs

The following needs were collected from the community by the Normal Heights Community Planning Group, covering public services, amenities, and infrastructure.

Economic Opportunity

1. Support new startups and small businesses, possibly linking them to SDSU
2. Encourage corner stores and neighborhood-serving retail (e.g., on Meade Ave)

Community Resources

3. The library has not conformed to the General Plan since 1984. The 1998 Mid-City Communities Plan recommendations were not implemented for Normal Heights or Kensington. Potential sites for community facilities currently include: Vons redevelopment, 35th & Adams, and Cherokee and Adams
4. Re-establish the seasonal community pool
5. Create a community bulletin board

6. Create a Senior Center with programming and facilities

Infrastructure

7. Undergrounding of utilities is ongoing but needs to consider box placement for visual quality and sidewalk access
8. Address 42 miles of broken sidewalks through financing programs and reinstatement of the Safe Sidewalk Program fee holiday, which expired July 1, 2026
9. Pave and repair alleys so that dirt does not wash or track onto streets, using surfaces built to withstand the weight of heavy trash trucks
10. Prevent overlap of trash removal services (2 passes per street by the city for trash, recycling, and green waste, plus 5 separate private haulers for commercial properties)
11. Improve street sweeping by removing parked cars from routes and meeting schedules
12. Improve street lighting for areas with higher pedestrian use
13. Increase number of trash receptacles on Adams Ave, focusing on retail locations that generate wrappers and cups
14. Build a shared parking structure beneath the ball field on Adams Ave, paired with an expanded recreation center
15. Assess water, sewer, and stormwater infrastructure capacity relative to increased density; evaluate opportunities for stormwater catchment and permeable surfaces

Cultural Events & Programming

16. Continue annual events (Films in the Park, Roots/Street Fair, Taste of Adams, Art on Adams) and expand to a Farmers Market and holiday parades
17. Paint electrical boxes as public art installations
18. Promote diversity and community-wide cultural programming
19. Revitalize the Urban Arts program to replace lost and aging murals and electrical box paintings

Green Space & Parks

20. Pursue freeway lid park as far North as possible
21. Install a park in the southwest corner of Normal Heights which is greater than 1/2 mile walking distance from green space
22. Create island parks on wider streets where curb cuts have removed curbside parking and generate heat islands

23. Develop community gardens and enhanced canyons with groomed trails, brush management, and invasive species removal
24. Improve public restrooms at the park and community center
25. Modify park points rubric to reflect actual value to community
26. Provide redevelopment incentives that convert curb cuts to landscaped parkways
27. Enforce joint access policies to ensure park access matches amenity points

Transportation

28. Fix paving surfaces as a prerequisite for micro-mobility infrastructure
29. Install bike racks, repair stations, and a continuous bike lane on Collier Ave with stop signs on north/south cross streets
30. Improve bus infrastructure, including shelters (eastbound across from Vons), and provide alternate north/south routes off the mesa: a direct bus connection from Adams Ave down to SDSU Mission Valley and the Green Line trolley, plus safe walking and biking routes down the canyon slopes. Normal Heights sits on a mesa with few ways down, so residents without a car have limited ability to reach destinations in Mission Valley and the communities north of the San Diego River
31. Study a streetcar/trolley on Adams Ave using the left turn lane and line following technology that qualifies as light rail
32. Implement traffic calming on Adams Ave including curb bulbs, crosswalk improvements (Adams/WMV), and painted crosswalks
33. Install a traffic circle at EMV/35th 5-way intersection
34. Convert 39th Street south of Adams to a one-way configuration to prevent AM commute line cutting
35. Deploy bus-mounted cameras for metered space monitoring and illegal parking (handicapped spaces, pedestrian ramps, daylighting)
36. Eliminate sharrow transitions within traffic circles on Meade
37. Institute traffic calming measures at Adams/WMV including pedestrian access from the bus stop on the south side of Adams Ave

Placemaking

38. Renew Normal Heights sign using a long-lasting enamel process
39. Improve the 805 bridge with design/aesthetic upgrades

40. Use design standards to restore historic streetscape and reduce fragmentation of historic districts
41. Create a central community square with street trees and defined public space
42. Remove billboards on Adams Ave
43. Continue facade improvement grants and architectural standards for businesses on Main Street corridors
44. Establish outdoor lighting standards to reduce light pollution and glare
45. Require and enforce publicly accessible plazas and setbacks as part of new development
46. Develop business café bump-outs on feeder streets off Adams Ave
47. Promote on-site amenities within new development to ensure community benefit is retained locally

Housing & Land Use

48. Use commercial/residential buffer zones to enable missing middle housing (townhomes and bungalow courts)
49. Allow adaptive reuse of garages and accessory structures for small retail without burdensome conversion requirements
50. Waive parking minimums for small retail below a defined square footage threshold
51. Establish community land trusts to preserve affordable commercial and residential space
52. Clarify and reform setbacks to prevent 0 lot line disputes and provide greenspace
53. Enforce open space municipal code on parcels to prevent edge-to-edge paving
54. Fix property line monuments and markers to prevent disputes
55. Extend city wildfire brush management to private property in canyons based on eminent domain for public safety
56. Update crosswalks to use durable surfaces and markers
57. Implement architectural standards for cohesive, high-quality development patterns (refer to page 162 of 1984 CP)

September 30, 2026

Department of City Planning
City of San Diego
San Diego, CA 92101
Attn: Mid City Community Planner

Subject: SANDAG IGR Comments on the Mid-City Communities Plan Update (Public Review Draft, August 2026)

The San Diego Association of Governments (SANDAG) appreciates the opportunity to review the public review draft of the Mid-City Communities Plan Update. SANDAG commends the City of San Diego for its work to advance multimodal mobility, sustainability, and equity across the Mid-City communities. The comments below are organized by page number and section to align with the structure of the draft plan.

Relationship To Other Plans

Page 9 – Relationship to Other Plans
SANDAG recommends including the SANDAG Regional Plan in this section. The plan is referenced later in the document (page 123) and should be introduced as a foundational regional policy document.

Cultural and Historic Resources

Page 38 – Historic Preservation: Tribal Cultural History

- The description of indigenous groups is incomplete. The San Diego region recognizes four cultural groups: Kumeyaay, Luiseño, Cupeño, and Cahuilla.
- The list of federally recognized bands should include Capitan Grande. The region contains 13 federally recognized bands, not 12.

Land Use, Sustainability, and Heat Resilience

Page 57 – Land Use and Mobility Connection
SANDAG recommends incorporating language acknowledging the need for shading and cooling features to support comfortable walking, biking, and transit use, particularly in areas with high heat vulnerability.

Transit Network and Priority Treatments

Page 94 – Figure 5.6
SANDAG recommends identifying the Euclid–54th Street triangle as a potential transit corridor or priority treatment area. Rapid 625 operates through this location, and improvements would support both its function and the area's designation as a transit

village.

Page 99 – Figure 5.9
SANDAG recommends relocating the Transit Signal Priority (TSP) callout from 70th Street to El Cajon Boulevard, where TSP more directly supports existing and planned transit service.

Page 100 – Figure 5.10
The map included in this figure appears incorrect and should be replaced with the intended map.

Bicycle Network and Bikeway Classifications

Page 121 – Bicycling
- SANDAG recommend adding pedestrian and bicycle Level of Traffic Stress (LTS) maps, consistent with recent community plan updates.
- SANDAG recommend including graphics or images to illustrate bikeway classifications.

Page 122 – Figure 6.2 – Planned Bicycle Network
- The "Transit Lanes" item under Microtransit should be moved to its own section.
- Adams Avenue: The 2025 Regional Plan modeled a Class IV protected bikeway for this corridor. Given destination density, collision history, connectivity, and vehicle speeds and volumes, a protected bikeway is warranted rather than a Class III Enhanced facility.
- Euclid Avenue (north of Home Avenue): SANDAG recommends upgrading this segment to Class IV. Vehicle speeds and volumes exceed thresholds for a Bicycle Boulevard, and the Draft Street Design Manual prohibits the traffic-calming needed for enhanced Class III treatments on collector streets.

Transit Network Map Corrections
Page 124 – Figure 6.3
- Rapid 211 appears on the map but is missing from the legend.
- Routes 14 and 18 appear in the legend but not on the map.
- Add directional arrows to Route 965 to reflect its unidirectional operation.

Transit Lanes and Flex Lanes
Page 127 – Figure 6.4
- Only El Cajon Boulevard shows transit lanes. SANDAG recommends identifying potential Transit or Flex Lanes on University Avenue, 54th Street, and Euclid Avenue.
- Transit lanes may not be necessary east of College Avenue on ECB. Mid-City Rapid service terminates at College Avenue, and Rapid 295 operates to SDSU via ECB and Montezuma; transit demand may not justify dedicated lanes in this segment.

Page 118 – Chapter 6 (Mobility and Transit Policies)
- SANDAG recommends adding Euclid Avenue to this policy section.
- SANDAG requests clarification regarding whether Flex Lanes are included in the updated plan.

Corridor Concept Analysis

Ideas and Concepts – Corridor Concept Analysis

- SANDAG recommends removing University Avenue (44th–69th Street) from the list of corridors identified for further analysis, as the corridor has been recently redesigned, constructed, or is currently under construction.
- SANDAG recommends adding Monroe Avenue (32nd Street–Collwood Blvd) to the focused corridor list. Initial conceptual engineering has been completed for Monroe Avenue, and the City could build upon this work.

SANDAG appreciates the opportunity to provide these comments and looks forward to continued collaboration with the City of San Diego and regional partners to support multimodal mobility, climate resilience, and equitable access across the Mid-City communities.

Please contact Kirsten Uchitel, Senior Planner at 619-699-7335 with any questions or for additional discussion on these comments.

Sincerely,

Keith Greer
Deputy Directo, Environmental Planning
San Diego Association of Governments

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
(619) 985-1587 | FAX (619) 688-4299 TTY 711
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November 4, 2026

11-SD-15, 94, 805
PM VAR
Mid-City Communities Plan Update Draft #1

Ms. Morgen Ruby, Senior Planner
City Planning Department
City of San Diego
202 C Street, M.S. 413
San Diego, CA 92101

Dear Ms. Ruby:

Thank you for including the California Department of Transportation (Caltrans) to review a first Draft of the Mid-City Communities Plan Update (CPU) located near State Route 15 (SR-15), Interstate 15 (I-15) State Route 94 (SR-94), and Interstate 805 (I-805). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Regional Planning Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

We look forward to working with the City of San Diego (City) in areas where the City and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Caltrans has the following comments:

The City of San Diego must consult with Caltrans on any proposed improvements that affect Caltrans' Right-of-Way (ROW), facilities, freeways, ramp operations, and safety.

Since the state highway system is a network, it is recommended to include the entire highway system in a community plan instead of up to centerline.

Please coordinate with Caltrans early for any project that impacts, is near, or is adjacent to Caltrans' Right-of-Way (R/W), freeway intersections, interchanges, or ramps.

Traffic Impact Study
When required at the time of project submittal, future developments will need to provide a Vehicle Miles Traveled (VMT) analysis, a Local Mobility Analysis (LMA), and a safety review consistent with the Caltrans Local Development Review (LDR) Safety Review Practitioner's Guidance. https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/202402-ldr-safety-review-practitioners-guidance-a11y.pdf

Traffic Engineering & Analysis
Study Area 1: Mid-City Center and Study Area 11: Mid-City West

- These study areas show a proposed project to Expand Teralta Lid Park north and south. These major projects are on Caltrans' R/W.
- Structural components will be required over the existing SR-15 freeway.
- Any proposed structures in Caltrans' R/W will need to be reviewed by Caltrans Structures and Maintenance.
- If Caltrans agrees to allow the proposed expansion of the Teralta Lid Park, then meeting Caltrans standards will be required.

The following comments apply to any impacts to Caltrans' R/W, including but not limited to Study Area 2, Study Area 3, Study Area 8:

- Making major physical changes to intersection approaches, including at ramp terminals, such as adding a leg to an intersection or widening to provide an additional through or turn lane will require the Intersection Safety and Operational Assessment.
- Mitigation measures for proposed intersection modifications are subject to the Caltrans Intersection Safety and Operational Assessment Policy (ISOAP). Alternative intersection design(s) will need to be considered in accordance with the ISOAP policy. Please refer to the policy for more information and requirements (https://dot.ca.gov/programs/traffic-operations/isoap).

Study Area 2: Marketplace at the Grove

- This study area shows a proposed College Avenue Cycle Track that will lead into Caltrans' R/W and interchange on SR-94.

- This study area shows the proposal to introduce new streets that will have impacts on Caltrans ramp intersections.

Study Area 3: Federal Boulevard & Euclid Avenue
This study area shows the proposal to introduce new streets that will have impacts on Caltrans ramp intersections.

Study Area 8: Adams Avenue
This study area proposes to increase housing density and community amenities. The Adams Avenue SR-15 freeway interchange should be included in the traffic studies to see impacts from these proposals.

Design/FHWA
Because I-15 and I-805 are federal highways, any proposed changes to I-15 and I-805 will need Federal Highway Administration (FHWA) review and approval.

System Planning
Under Chapter 6 Mobility – Section 6.18 Freeways, the draft CPU recognized that ongoing coordination with Caltrans supports the evaluation and implementation of safe and accessible pedestrian and bicycle connections and crossings through I-8, I-805, SR-15, and SR-94, linking Mid-City with surrounding communities. Caltrans welcomes the opportunity to further discuss these projects.

Please note the current ongoing efforts related to these topics below:

- Caltrans and SANDAG are working together to develop the SR-94 CMCP with a scheduled completion date of June 2027. This plan will include wide-ranging information that supports the CPU as it relates to transportation.
- SANDAG is leading a project development team for the Rapid Bus 688 (San Ysidro to UTC via Sorrento Mesa). Rapid 688 route goals are to provide a new, inland transit route connecting the international border, housing-rich areas in the South Bay and central San Diego, and major employment centers to the north. The goals also aim to obtain public and stakeholder support for alternatives and produce realistic route alternatives for environmental evaluation. The route will start at the San Ysidro Transit Center and travel north along I-805 until it merges onto SR-15, where it will connect to the existing centerline stations in City Heights, head north to Kearny Mesa, head west on SR 52, and finally north on I-805 before ending at UTC/Sorrento Mesa. Caltrans is a partner in this planning effort.

Under Chapter 4 Sustainability, Equity, Resilience and Conservation – Policy 4.3 discusses the I-15 CMCP. The I-15 CMCP will not be moving forward and will be rescoped. Caltrans will instead prepare Corridor Plans. Please remove references to the I-15 CMCP in the Mid-City CPU.

Please consider vehicle miles travelled (VMT) reduction concepts in your discussion of greenhouse gas emissions reduction targets. Various planning documents that Caltrans referenced in past reviews provide vast information on VMT and greenhouse gas reduction strategies. The updated SANDAG 2025 Regional Plan listed below addresses VMT and Senate Bill 375 greenhouse gas reductions for specific vehicle classes.

In the areas related to specialized transportation services for seniors and people with disabilities, please consider adding language that pertains to paratransit and other curb-to-curb transportation services.

Please continue to consider the various planning documents that we suggested during the 2025 Mid-City Communities Plan Update Draft Atlas, Engagement Summary, and Idea Report review. Note that the SANDAG 2025 Regional Plan has been finalized and that under Appendix A: Transportation Projects, Programs, Policies, and Phasing, there are updated transportation plans to support the Mid-City CPU. Also note that the California Transportation Plan is currently being updated; the next iteration is the California Transportation Plan 2050 Pathways, currently in the draft stage.

Complete Streets and Mobility Network
It is recommended to include proposed bikeways through Caltrans' R/W. Please illustrate the planned bikeways just outside of the Mid-City CPU boundaries. Also, Euclid Avenue at the SR-94 features an existing Class II bikeway and reflects the City's Bike Master Plan Update. Please include the existing class II bikeway on the map.

Noise
The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-15, SR-94 or I-805.

Right-of-Way
Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

If you have any questions or concerns, please contact Rob Owen, Regional Planner, at (619) 930-7203 or by e-mail sent to robin.owen@dot.ca.gov.

Sincerely,

Kimberly D. Dodson

KIMBERLY D. DODSON, GISP
Branch Chief
Local Development Review/Regional Planning

RE: Coalition Letter Urging Mid-City Plan Draft Plan Update on Mobility, Transit, and Zoning

Planning Department
City of San Diego

RE: Coalition Letter Urging Mid-City Plan Draft Plan Update on Mobility, Transit, and Zoning

Dear Planning Department Staff:

We appreciate the significant effort that has gone into creating the Mid-City Community Draft Plan and recognize the plan's emphasis on expanding and improving public transportation, bicycle infrastructure, and housing opportunities throughout the Mid-City area.

However, while the draft identifies and maps out many important transportation and biking infrastructure projects, the plan does not go far enough in aligning future housing growth with existing and planned high-quality transit and bicycle infrastructure, expanding housing opportunities in higher resource neighborhoods, and filling some gaps in the current plan's overall high-quality transit and bicycle infrastructure.

We, the undersigned housing, cycling, and public transportation organizations, write to encourage the Planning Department to:

1. Plan additional housing around existing and planned high-quality transit and bicycle infrastructure

Mid-City is positioned to become one of San Diego's strongest transit-connected communities. The area is already served by the Rapid 215 and Rapid 235, with plans to receive additional high-quality service through Rapid 210, Rapid 256, Rapid 295, Rapid 625, Rapid 688, improvements to Routes 13 and 955, and the proposed Purple Line.

The final plan should more deliberately align land use with this transit investment by creating additional transit-focused housing hubs and by increasing housing capacity along major transit corridors, particularly El Cajon Boulevard, University Avenue, College Avenue, 54th Street, Euclid Avenue, Fairmount Avenue, and near the SR-15 transit stations.

Land uses surrounding planned Rapid stops should be zoned to support enough residents, jobs, and destinations to make these investments successful. This is especially true for areas around the Rapid 625 and Rapid 210—both planned near-term projects—with major stops along most of University Avenue, parts of 54th Street, and Euclid Avenue, and other major transfer points where multiple frequent routes will intersect.

Land-use planning should also recognize that successful transit requires more than designating routes on a map. These corridors need infrastructure that allows buses to operate quickly and reliably. The final plan should therefore pair additional housing with commitments to transit-priority improvements, including bus lanes, transit signal priority, improved stations and bus stops, complete with seating and shade, and safe walking and bicycling connections to transit.

Efforts should also create new regional hubs to align with many peer plan updates. Zoning for such hubs has been included along Fairmount at El Cajon and University; however, many other high-quality transit hubs were not included. The intersection of Euclid and Federal, for example, is planned to have a Rapid 625 stop, which is a project in advanced planning, as well as a potential Purple Line stop. Another example is the two SR-15 Busway stops, both of which serve as major transfers and transit hubs.

2. Implement the City's "Class IV First" policy and plan for transit-priority lanes on frequent bus and Rapid corridors

The final plan should establish an all-ages-and-abilities standard for the bicycle network and implement the City's adopted "Class IV First" approach.

The draft identifies high bicycle demand and significant traffic stress along El Cajon Boulevard, University Avenue, Euclid Avenue, Adams Avenue, and other major corridors. The final plan should consistently provide physical protection where traffic volumes and speeds make painted or shared-lane facilities inappropriate.

This is especially important on Adams Avenue, where a Class III Enhanced facility is not sufficient for the traffic volumes and speeds found along the corridor. The Planned Mobility Map should instead identify a Class IV protected facility between I-805 and SR-15.

A successful bicycle network should also be measured by whether people can safely and comfortably reach schools, jobs, commercial districts, parks, transit stations, and neighboring communities, rather than simply by the number of bikeway miles shown on a map. Recent regional research has similarly identified safety, connectivity, and incomplete networks as major barriers to bicycling.

The urgency of these investments is reinforced by Mid-City's collision history. From 2015 through September 2026, El Cajon Boulevard, University Avenue, Euclid Avenue, and Fairmount Avenue experienced approximately 2,929 injury or fatal collisions, 3,828 injuries, and 37 deaths. At least 564 pedestrians and 194 bicyclists were injured or killed. Among fatalities where travel mode was identified, approximately 80 percent were people walking or bicycling.

El Cajon Boulevard and University Avenue stand out in particular:

- El Cajon Boulevard experienced approximately 1,051 injury or fatal collisions and 20 deaths, including at least 15 pedestrian fatalities.
- University Avenue experienced approximately 1,068 injury or fatal collisions and 10 deaths, including at least 252 pedestrians and 86 bicyclists injured or killed.

The final plan should identify El Cajon Boulevard, University Avenue, Euclid Avenue, and Fairmount Avenue as priority safety and multimodal investment corridors and connect their implementation directly to the Mobility Master Plan and future capital programming.

Transit improvements should be pursued with the same level of specificity. Planned Rapid service will not achieve its intended speed and reliability if buses remain stuck in general traffic. The final plan should establish a framework for transit-priority lanes along:

- El Cajon Boulevard, with continued implementation of transit lanes and future study of center-running transit;
- University Avenue, particularly between I-805, the City Heights Transit Plaza, Euclid Avenue, College Avenue, and the La Mesa city limit;
- Fairmount Avenue and the Fairmount Expressway, including peak-direction priority and the Fairmount/43rd Street couplet;
- 54th Street and Euclid Avenue to support Rapid 625 and Route 955; and
- College Avenue to support Rapid 625 and Rapid 256.

The final plan should also establish an implementation program identifying responsible agencies, estimated costs, potential funding sources, and near-, medium-, and long-term timelines. Projects addressing fatal and serious injury corridors, high-stress bicycle gaps, unsafe pedestrian crossings, and unreliable transit should receive the highest priority.

3. Increase housing opportunities in moderate and high resource areas.

While El Cajon Boulevard and Adams Avenue were significantly upzoned, along with blocks directly adjacent to Adams Avenue and the block north of El Cajon Boulevard, we believe this upzoning is less than acceptable, given that neighboring parts of City Heights have been significantly upzoned through this plan. City guidance is to prioritize adding more housing in higher-resource areas, and the Mid-City Plan update should follow this critical direction. More people should be able to live in areas with lower poverty rates, better access to education, and greater proximity to jobs. These areas in the Mid-City plan area are more similar than different to their counterparts south of El Cajon Boulevard and should be zoned accordingly.

4. Request that SANDAG study the Teralta Neighborhood Park Expansions and that the City of San Diego study an Enhanced Infrastructure Financing District to provide partial funding to the Teralta Neighborhood Park Expansions.

We support the Draft Plan's inclusion of the Teralta Neighborhood South and Teralta Neighborhood North Expansions. These expansions to Teralta Park have the potential to transform the surrounding area, which has endured significant negative impacts from SR-15. However, other community plans have included freeway caps and seen little to no progress. For example, the Downtown Community Plan has included a freeway cap over I-5 for 19 years. In order to ensure this does not occur, tangible first steps must be taken.

A proposed freeway cap over I-5 in Barrio Logan received $2.5 million for a study. A similar study should be pursued with SANDAG as the lead agency, in close coordination with Caltrans District 11. Potential funding sources for the project should be studied by the City of San Diego. We also believe that the city should complete the air and noise study as part of the Mid-City plan update and include an alternative with a fully built-out SR-15 freeway cap.

An Enhanced Infrastructure Financing District should be studied with considerations for potentially extended timelines similar to those granted to LA County with up to 75-year time periods. We recommend 10% of the funds from a future EIFD be dedicated to affordable housing and 10% of the funds be dedicated to public transportation and micromobility infrastructure. The remaining 80% should be dedicated to servicing the debt for the construction of the Teralta Park extensions.

5. Adopt zoning that is consistent with the San Diego City Council-adopted SB 79 plan fire map.

The Mid-City plan update area includes 3 qualifying SB 79 transit stops according to SANDAG, and overlapping areas from 2 neighboring transit stops in North Park. The City Planning Department has fulfilled SB 79 requirements in the plan area except in the City's Very High Fire Severity Zone. City staff promised that areas under the proposed City SB 79 policy on which properties would be included or excluded from SB 79.

Under the City of San Diego's rules, a property within a Very High Fire Severity Zone is exempt from SB 79 only if it is accessible via a single access point. This means that even if a property falls under a Very High Fire Severity Zone, it would be exempt only if it is on a cul-de-sac. Therefore, we believe the city should adopt SB 79-equivalent zoning in two missing areas in Kensington and Talmadge.

6. Keep Complete Communities as it currently functions throughout San Diego.

Complete Communities plays an important role in making San Diego a uniquely pro-housing city in California. Key differences between SB 79 and Complete Communities cannot be ignored. Specifically, projects that use Complete Communities are granted streamlined ministerial approval. Without this, many affordable housing projects and projects with a mix of affordable and market-rate housing would not have been built in the parts of San Diego that most need diverse housing opportunities.

We urge the Planning Department to avoid the mistake of setting a precedent that removes Complete Communities from otherwise qualifying parcels in community plan updates.

Sincerely,

Ethan Paul
Board Member, BuildSD

Anar Salayev
Executive Director, BikeSD

Chloé Lauer
Executive Director, San Diego County Bicycle Coalition

Leif Gensert
Vice President, RideSD

Save Our Heritage Organisation
Protecting San Diego's architectural and cultural heritage since 1969

September 28, 2026

Re: Mid-City Communities Plan Update—Kensington-Talmadge

Dear City of San Diego Planning Department:

Save Our Heritage Organization (SOHO) appreciates the opportunity to comment on the draft Mid-City Communities Plan Update. As San Diego County's historic preservation advocacy organization, we are particularly concerned that the draft plan does not adequately recognize, protect or integrate the historic resources and historic neighborhoods that are an important part of Kensington-Talmadge.

Historic resources must be explicitly incorporated into the community plan. One of the most concerning aspects of the draft is the failure to include the boundaries of existing and proposed historic districts. The community analysis also notes that these historic-district boundaries have not been respected in the City's zoning decisions.

This is particularly troubling because the proposed density increases extend into an area containing the community's National Register Historic District. The first five blocks of this historic district are among the areas affected by the proposed increased density. This area also serves as an entrance to a Very High Fire Hazard Severity Zone, making the preservation of its established historic character and development pattern especially important.

The draft plan should clearly identify historic districts and individually significant historic resources and establish policies that ensure new development does not undermine the character, integrity or significance of those resources. Historic resources should not simply be mapped separately from the land-use plan; their presence should meaningfully inform the City's decisions about appropriate development patterns, scale and intensity.

Kensington-Talmadge's historic neighborhoods are significant community assets. The community analysis accompanying the draft appropriately identifies concern that the location and nature of the proposed density increases are not compatible with the historic nature of the community.

We are also concerned about the cumulative effect of the City's various development programs on historic neighborhoods and districts. The community analysis points out that the draft does not adequately identify or account for existing and proposed bonus programs, including Bonus ADUs, SB 79 Transit-Oriented Development and Complete Communities Housing Solutions.

When these programs are considered together with the proposed zoning, the resulting development potential could permit six- to eight-story multifamily buildings in substantial portions of Kensington and Talmadge. The City should evaluate this cumulative development potential specifically in relation to historic districts and historic neighborhoods. Otherwise, the individual impacts of multiple programs may be considered separately while their combined effect could fundamentally alter the character of a historic community.

Historic preservation must be considered at the outset of planning, not after development capacity has already been established. Once historic buildings, streetscapes and neighborhood patterns are lost, they cannot be recreated. The Mid-City Communities Plan therefore represents an important opportunity to ensure that future growth does not inadvertently compromise the historic resources that define Kensington-Talmadge.

SOHO requests that the City:

1. **Identify all existing and proposed historic districts and significant historic resources** within the Mid-City Communities Plan area and incorporate their boundaries into the plan and associated land-use maps.
2. **Evaluate proposed land-use changes in relation to historic resources and districts,** including the scale, massing, intensity and potential cumulative effects of new development on historic neighborhoods.
3. **Establish clear policies protecting historic districts and significant historic resources from incompatible development**, rather than treating historic preservation as a separate or secondary consideration.
4. **Evaluate the cumulative development potential created by the proposed zoning together with existing and proposed bonus programs,** including Bonus ADUs, SB 79 and Complete Communities Housing Solutions, and specifically consider their potential effects on historic resources.
5. **Ensure that the final community plan recognizes the historic character of Kensington-Talmadge as a funda mental component of the community's future**, including its historic districts, historic buildings, streetscapes and established neighborhood patterns.
6. **Therefore, do not change RS-1-7 zoning.**

San Diego's historic neighborhoods are irreplaceable public resources. The Mid-City Communities Plan should ensure that the City's long-term planning decisions recognize their value and provide a meaningful framework for their preservation.

We urge the City to revise the draft plan accordingly and to fully integrate historic preservation into the planning framework for Kensington-Talmadge.

Sincerely,



Bruce D. Coons
Executive Director
Save Our Heritage Organisation

THE BOULEVARD
EL CAJON BOULEVARD BUSINESS IMPROVEMENT ASSOCIATION

To: City of San Diego Planning Department
From: El Cajon Boulevard Business Improvement Association
Date: October 5, 2026
Re: El Cajon Boulevard Concepts in the Draft Mid-City Communities Plan

The El Cajon Boulevard Business Improvement Association supports the concepts identified for El Cajon Boulevard in the Draft Mid-City Communities Plan. These policies provide a strong framework for encouraging investment, housing, active commercial uses, cultural identity, historic preservation, and improved mobility along the corridor.

We particularly support:

- **Urban Village and Community Commercial designations** that encourage higher-density, mixed-use development, housing, active storefronts, and public spaces.
- **Restrictions on less-active commercial uses**, including self-storage, car storage, data centers, and drive-through uses, which can limit opportunities for active storefronts.
- **Adaptive reuse of historic and older buildings**, which can preserve the character of El Cajon Boulevard while supporting new investment and businesses.
- **Recognition of the Little Saigon Cultural District** and the goal of creating a vibrant, pedestrian-friendly cultural corridor connecting businesses, institutions, public spaces, transit, and cultural destinations.

We do want to note that **business owners have reservations about extending the Bus/Bike lane through the Little Saigon Cultural District**. While we support improved bicycle and multimodal transportation connections and were instrumental in creating the bus/bike lane on El Cajon Boulevard, businesses have expressed concerns about the potential impacts on parking, access, deliveries, and customer activity. We encourage the City to work closely with affected businesses and the El Cajon Blvd Business Improvement Association to address these concerns and evaluate the design carefully as the plan moves forward.

Overall, The Boulevard supports the direction of the draft plan and believes these concepts can help strengthen El Cajon Boulevard as a diverse, active, and economically vibrant commercial corridor.

Respectfully,

Tootie Thomas, Executive Director
El Cajon Boulevard Business Improvement Association

normal heights for Smart Growth

WHITE PAPER

Mid-City Communities Plan Update

Economic Development Element

Integrating Prosperity with Planning

SUBMITTED TO	City of San Diego, City Planning Department
IN SUPPORT OF	Mid-City Communities Plan Update
COMMUNITIES	City Heights · Eastern Area · Kensington-Talmadge · Normal Heights
PREPARED BY	Normal Heights for Smart Growth, a 501(c)(3) nonprofit
DATE	October 26, 2026

Credits & Acknowledgments

PREPARED BY



Normal Heights for Smart Growth — normalheightsforsmartgrowth.org

ACKNOWLEDGMENTS

The authors thank the following individuals and organizations for their contributions:

Community Planners Committee
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Normal Heights Community Planning Group
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Eastern Area Community Planning Group
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City of San Diego
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TBPN
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Normal Heights for Smart Growth, 501(c)(3)
Dr. Margaret Friend
Dr. Caroline McKeown
Gerald Scholen
Paul Coogan

SUGGESTED CITATION

Normal Heights for Smart Growth. (2026). *Mid-City Communities Plan Update Economic Development Element: Integrating Prosperity with Planning*. White paper submitted to the City of San Diego for the Mid-City Communities Plan Update.

This white paper represents the views of its authors and does not necessarily reflect the positions of the City of San Diego.

CHAPTER

01

Introduction

The Mid-City Communities Plan includes four community planning areas (City Heights, Eastern Area, Kensington-Talmadge, Normal Heights) and serves as the region-specific 30-year vision in alignment with the City's General Plan.

The first Community Plan in 1965 was created as a general development plan and was updated in 1984 to be community centered. The current plan, approved in 1998, was created at the dawn of the personal computer and could not account for seismic shifts in the economy as retail stores moved online, international trade agreements shifted manufacturing overseas, and advances in new technology created industries not imagined before.

Throughout all previous community plans, economic development has been a last-chapter section of the plan or referenced in other chapters in a laissez-faire "build it and they will come" approach. An objective analysis shows a track record of aspirational planning that does not come to fruition due to the lack of an innovative economic development plan supported by a financing plan.

> *Economic development is not just a single factor in a community plan but is the underlying enabler of the entire plan.*

Economic gains for the community and the city are both direct and indirect as well as quantifiable and qualitative.

DIRECT ECONOMIC BENEFIT

- Taxation
- Licensing and fees
- Business Improvement District and Maintenance Assessment District fees
- Local supply chains (profits at each point in the chain stay in the city)

INDIRECT ECONOMIC BENEFIT

- Increased revenues to other businesses (Coco & Jules gains customers headed to Blind Lady Ale House)
- Activated storefronts attract walking customers
- Local manufacturers obtain products locally, reducing shipping time and cost.

CHAPTER

02

Desired Environment for Startups

Founders select a location for a startup business based on:

1. Direct access to buyers, suppliers, and talent.
2. Amenities that attract and retain talent and customers.
3. Affordability and financial support.

Existing flagship industries of defense/technology manufacturing and biotech are an attractor for traditional and narrowly defined businesses, but innovative startups are diverse and can include unexpected cross-sector products and services. Thus building for specific industries can carry a certain degree of risk. Urban malls were once thought of as stable economic anchors.

2.1 Local Markets and Supply Chains

Startup businesses can be B2C and B2B in a wide range of modes. A law firm will have very different requirements than small-scale manufacturing, so it becomes important for the city to be flexible in collaborating with these new businesses.

2.2 Talent Acquisition

Collaboration between local universities and the city needs to be developed to retain talent that desires to stay in the region. Current city policy and programs focus on workforce training for existing industries and providing assistance to a small set of businesses defined in Council Policy 900-14. There needs to be investment in amenities that will attract talent nationally and retain existing talent.

Founders and their teams are looking for amenities that are found in Smart Growth principles:

1. Distinctive, attractive communities with a strong sense of place
2. Local parks, open space, and libraries
3. Variety of transportation choices including light rail and protected bike lanes

ACADEMIC INNOVATION CENTERS

The number of academic institutions in San Diego is quite large and remains a mostly untapped source of new businesses and economic growth in the region. These universities already have innovation programs designed to train designers, inventors, and innovators into viable entrepreneurs. San Diego needs to be a part of the graduate's future planning by providing an on-ramp to staying in the region.

2.3 Affordability

The startup phase of a new business is tenuous, and the farther a budget can be stretched the higher the possibility of success and economic returns to the city and community. Housing and transportation account for 40 to 44% of living expenses in Southern California cities. In this analysis, six cities in the SoCal area were selected based on having a similar population to the San Diego Mid-City planning area and having reputations as destinations for young entrepreneurs.

Table 2.1 Housing and transportation costs in comparable Southern California cities

City	Median rent / month (1 BR)	Regional transportation cost (% of income)
Pasadena	$2,265	16%
Santa Monica	$2,402	16%
Irvine	$2,997	16%
Oceanside	$2,303	18%
Escondido	$2,046	18%
San Diego	**$2,313**	**18%**
Chula Vista	$2,229	18%

Source: Median rent — U.S. Census Bureau, American Community Survey 2020–2024 5-Year Estimates (median gross rent), retrieved from Census QuickFacts, October 2026. Transportation — U.S. Bureau of Labor Statistics, Consumer Expenditure Surveys, 2023–24 two-year averages, metropolitan area news releases for San Diego and Los Angeles. Shares are transportation as a percentage of average annual household expenditures.

San Diego housing affordability competes with Pasadena, Oceanside, Escondido, and Chula Vista to the south; however, lower transportation costs in the Los Angeles metro area give the overall advantage to Pasadena.

2.4 Public Amenities

Startup businesses are often defined by an independent entrepreneurial spirit that will seek out not only the most financially favorable location but also a location that will be fulfilling to live and work in. Some businesses may be constrained to specific locations due to logistics, but these barriers are being lowered dramatically as services become digitized or manufactured at the edge of distribution, e.g., on-demand 3D printing and CNC milling.

This leveling of the playing field means that an engineering firm no longer needs to be near shipyards and can easily be located in a city that attracts top talent with a strong sense of place, walkability, parks, open space, libraries, and mobility options.

Mid-City, San Diego came out ahead on amenities compared to other cities in the San Diego metro area; however, Mid-City was consistently outclassed by Pasadena and Santa Monica, the latter by a wide margin. It should be noted that Pasadena has a robust urban forest that compensates for the lower score on park proximity.

Table 2.2 Public amenity comparison

Area	Population	Walk Score	Transit Score	Bike Score	Residents within 10-min walk of a park	Libraries per 100K residents
Pasadena	135,804	69	51	70	70%	8.1
Santa Monica	90,082	83	60	88	83%	5.6
Irvine	318,764	43	26	69	94%	0.9
Oceanside	170,483	39	33	33	55%	1.2
Escondido	146,030	45	30	40	51%	0.7
Mid-City, San Diego	**123,150**	**74**	**47**	**50**	**79%**	**2.4**
Chula Vista	275,533	46	35	41	70%	1.1

Sources: Population — U.S. Census Bureau, QuickFacts, Vintage 2025 population estimates (July 1, 2025); Mid-City population is the sum of Walk Score neighborhood populations for Normal Heights, City Heights, Kensington, Talmadge, Rolando, Oak Park and Webster. Walk Score, Transit Score and Bike Score — Walk Score (walkscore.com), city and neighborhood pages, accessed October 3, 2026; Mid-City scores are the simple average of its four community planning areas. Park access — Trust for Public Land, ParkServe city pages (tpl.org/city), share of residents within a 10-minute walk of a park, accessed October 3, 2026. Mid-City park access — author's analysis: share of parcels within a half-mile radius of a park, 24,010 of 30,242 parcels (79.4%), calculated in QGIS, October 2026. Libraries — public library locations per 100,000 residents, author's calculation from library system counts and the populations above.

2.5 Flexible Spaces

Access by new businesses to both indoor and outdoor spaces should be supported by a combination of public-private partnerships to support the burden of cost and streamline permitting. Activation of storefronts in commercial zones will contribute to the culture, vibrancy, and walkability of the neighborhood while reducing blight.

- Identification of a Community Space Coordinator who can navigate sourcing potential sites, provide details on site functions and capacity, and assist in navigating the acquisition process.
- Identification of governmental points of contact to enable coordination across departments for licenses, permits, fees, and coordination with public safety officers if needed.
- Identification of supporting entities in the community including like-minded and companion businesses, chambers of commerce, and business associations.
- Creation of a short-term rental process to allow sub-leasing and temporary occupation of empty or underused commercial spaces.

- Involvement of local and national nonprofit organizations that support both startups and the activation of neighborhoods, e.g., Better Block Foundation.

INDOOR SPACES

Businesses need indoor spaces that can flex to meet the needs of the startup. These spaces can range from simple shared desktops to industrial kitchens or commercial warehouse and manufacturing spaces. Flexibility to scale up and down can be critical for managing the unpredictable contour of new businesses.

Spaces that can expand or contract with changes in staff and required floor space include:

- Co-working office environments
- Sub-divided retail/commercial spaces
- Activation of vacant properties
- Off-peak use of parking lots
- Access to public facilities, e.g., aquatic center
- Flexible power and water usage to prevent unnecessary relocation
- Ingress and egress sound requirements, e.g., recording studio vs. auto shop.

Specific examples currently working in other cities include:

- MERGE, CoWork @ 808, and North Liberty CoLab spaces operated by Greater Iowa City, Inc. are designed to create and cultivate a knowledge ecosystem for entrepreneurs and startups, offering vital resources and connections to successfully create, launch and grow new companies in Iowa City/Cedar Rapids, Iowa.
- NextSpace uses a model framed as recruiting many small companies as an economic anchor instead of one large employer. The company has expanded to multiple Northern California cities in partnership with local governments.

OUTDOOR SPACES

Outdoor spaces also have a wide range of potential uses, and there should be consideration of overlaps related to timeshare models, cooperative relationships, or subdivision of space. A few illustrative examples are:

- Music venues
- Sports leagues
- Agricultural uses
- Public markets and outdoor dining
- Product testing for drone technology and material science
- Transportation and mobility product testing

Specific examples currently working in San Diego include:

- Quartyard SD
- Liberty Station
- Logan Heights public market

2.6 Concierge Services

Startup businesses have a wide range of possible forms depending on the sector and degree of specialization. Number of employees and square footage of a facility no longer define the impact or revenue potential of a new business. Many types of businesses do fit the traditional new business model, especially in the service sector; however, new technologies and innovations increasingly have complex requirements that cross multiple agencies and departments.

For this reason, the ability of the city to provide concierge services to navigate municipal code, fee structures, and other bureaucratic processes is essential. These services may include partnerships with other institutions and organizations with specialized knowledge.

2.7 Financial Support

The city can work with investment capital organizations in the private sector to endorse businesses that show a promise of economic impact for the community. Supporting the funding of new business can take many forms.

- Economic impact analysis for use in pro forma
- Fast tracking and cost reduction programs
- Identification of low-cost resources (services, data, advice, facilities)
- Supporting public/private partnerships
- Programs to incentivize new mixed-use developments to provide reduced commercial rents for an introductory period.

Most of these programs come at a minimal cost and only require increased cross-functional coordination. Sources of direct funding for programs can come from:

- Economic development grants
- Developer incentives
- Corporate and Chamber of Commerce sponsorship

Conclusion

Increases in density to stabilize housing prices require the scaling and enhancement of accompanying amenities. Economic development is the key driver of economic growth to pay for the amenities and thus is not just a single factor in a community plan but is the underlying enabler of the entire plan.

References

General Plan
https://www.sandiego.gov/planning/work/general-plan

City of San Diego Fiscal Year 2027 Draft Budget
https://www.sandiego.gov/sites/default/files/pb_v2econdev.pdf

San Diego Strategic Plan Priority Areas of Focus
https://www.sandiego.gov/sites/default/files/strategic_-plan-fact-sheet.pdf

Strategic Plan
https://performance.sandiego.gov/assets/pdf/City_of_San_Diego_Strategic_Plan_2022.pdf

Community Plan Update Web Page
https://www.sandiego.gov/planning/mid-city-communities-plan-update

Community Plan Update First Draft
https://www.sandiego.gov/sites/default/files/2026-08/draft-mid-city-cpu.pdf

1998 Mid-City Communities Plan (Current Plan)
https://www.sandiego.gov/sites/default/files/2025-12/mid-city.pdf

1984 Mid-City Community Plan
https://www.sandiego.gov/sites/default/files/2023-12/1984%20Mid-City%20Community%20Plan_Web.pdf

1965 Mid-City Development Plan
https://www.sandiego.gov/sites/default/files/2023-12/1965%20Mid-City%20Development%20Plan_Web.pdf

Draft Mid-City Ideas Report
https://www.sandiego.gov/sites/default/files/2025-08/draft-ideas-report-august-2025.pdf

Mid-City Communities Plan Update Working Group Meeting – Feb. 25, 2026, English (YouTube)
https://www.youtube.com/watch?v=vioXwpShBRQ

Mid-City Communities Plan Update Working Group Meeting – October 29, 2025, English (YouTube)
https://www.youtube.com/watch?v=_WxdSBB7u3U

October 1, 2026

To:
City of San Diego
City Planning Department
Mid-City Communities Plan Update Working Group

RE: Public Comment on the First Draft Mid-City Communities Plan Update

Dear City Planning Staff and Working Group Members,

City Heights Community Development Corporation (CHCDC), together with the SR-15 Transportation Equity and Affordable Housing (TEAH) Task Force and the City Heights Built Environment Team (BET), appreciates the opportunity to provide comments on the first draft of the Mid-City Communities Plan Update.

TEAH and BET are resident-led groups facilitated by CHCDC that bring City Heights residents into ongoing conversations about transportation, housing, land use, displacement, and the broader built environment. Residents have been actively engaged throughout the Community Plan Update process through recurring meetings and capacity-building sessions, community surveys and mapping, letter writing, and providing public comments. Members have heard directly from planning professionals and subject-matter experts and have engaged with City staff and Mid-City Communities Plan Update Working Group representatives throughout the process. Most recently, Principal Planner Alex Frost joined TEAH and BET to walk residents through the first draft, answer questions, and discuss its implications for City Heights.

The recommendations below reflect the time and input residents have contributed throughout this process and highlight changes that would better align the draft with the community's priorities and lived experience.

SUMMARY OF COMMUNITY PRIORITIES & RECOMMENDATIONS

While the sections that follow provide specific suggested policy language, these recommendations are generally focused on making sure that future growth and investment in Mid-City supports existing residents, strengthens community assets, and establishes clear mechanisms for implementation and accountability.

Our recommendations focus on the following priorities:

- **Housing opportunity, affordability, and stability | Sections 2.5, 2.6, 2.7, 2.10, 2.11, 2.12, 2.13, 2.14, and 2.15.** Residents support expanding housing opportunities while ensuring that growth does not come at the expense of existing

residents. These recommendations call for clearer implementation standards for a wider range of housing types, stronger preservation of existing housing, expanded pathways to affordable homeownership and community ownership, and greater accountability when public incentives or benefits are provided. They also emphasize tenant protections, relocation assistance, right-to-return opportunities, and measurable strategies to reduce displacement and preserve affordable housing.

- **Protection of community-serving food resources and environmental health | Sections 4.6 and 4.12.** Residents want the Plan to recognize and protect existing community food-growing spaces, including New Roots Community Farm, as important neighborhood resources that support access to healthy food, social connection, green space, and community resilience. The recommendations also call for stronger environmental protections when potentially contaminated sites are redeveloped, including appropriate assessment, remediation, and coordination with environmental and public health agencies.
- **Recognition and preservation of cultural identity | Section 5.58.** Residents strongly support the Plan's emphasis on cultural districts and want that framework to expand to recognize a community-led Latine cultural corridor. The recommendation emphasizes identifying and protecting culturally significant businesses, institutions, gathering spaces, events, artwork, and other resources that contribute to community identity, while connecting cultural preservation with small-business stabilization and anti-displacement efforts.
- **A connected multimodal transportation system | Sections 6.1 and 6.12.** Residents want transportation investments to give practical choices for moving through Mid-City. The recommendations call for a connected network that better links walking, rolling, bicycling, transit, microtransit, and driving; closes gaps between different modes; and improves connections to everyday destinations. They also emphasize improving transit frequency, coverage, amenities, and first- and last-mile connections so that residents have realistic alternatives for trips that currently require driving.

The upcoming sections provide detailed recommendations for each policy identified above, including the existing draft language and the proposed revisions developed through TEAH and BET's review.

SECTION 2.5

Existing Draft Plan Language:

Encourage rental and ownership opportunities in all types of housing, including companion units, live/work studios, and shopkeeper units as well as small-lot housing.

Suggested Language:

Identify and remove unnecessary regulatory, zoning, permitting, and financial barriers across housing types - including companion units, live/work, shopkeeper, and small-lot housing - and shall establish clear standards, streamlined approval procedures, and measurable production goals. Relevant departments shall report annually on applications, approvals, permitting timelines, units constructed, and barriers that continue to impede production.

Periodically evaluate whether this policy is producing meaningful rental and ownership opportunities across the identified housing types and shall recommend policy or regulatory changes when established goals are not being met.

Housing development projects receiving City incentives or benefits shall be subject to written implementation agreements specifying required outcomes, milestones, and completion dates for the construction of companion units, live/work, shopkeeper, and small lot housing. Failure to meet those requirements without demonstrated good cause may result in corrective action, including suspension or repayment of City financial assistance, loss or reduction of discretionary incentives, recapture of benefits where legally permissible, or ineligibility for future discretionary City assistance until the project is brought into compliance.

Where City funding, land, regulatory incentives, density bonuses, fee reductions, expedited processing, or other public benefits are provided to support a project, the City shall establish enforceable performance requirements and deadlines consistent with the public benefits received.

SECTION 2.6

Existing Draft Plan Language:

Encourage preservation and renovation of culturally and historically significant residential units in a sustainable manner.

Suggested Language:

Identify and reduce unnecessary regulatory, permitting, and financial barriers to the rehabilitation and continued use of existing Mid-City residential buildings that are of cultural and historical significance. Relevant departments shall establish clear and timely procedures for renovation and rehabilitation projects and identify incentives, technical assistance, financing tools, or expedited permitting that can help property owners preserve existing housing rather than allow it to deteriorate or be unnecessarily removed from the housing stock.

Establish measurable objectives for preservation of residential buildings that are of cultural and historical significance, and shall report periodically on residential units

preserved, rehabilitated, substantially renovated, demolished, or removed from the housing stock.

Where City funding, tax benefits, regulatory incentives, fee reductions, expedited approvals, or other public benefits are provided for preservation or rehabilitation, recipients shall enter into enforceable agreements establishing the work to be completed, applicable preservation requirements, milestones, and completion deadlines.

Periodically evaluate whether its policies are successfully preserving existing housing and preventing avoidable deterioration, vacancy, or loss of residential units and shall recommend corrective regulatory, programmatic, or budgetary actions when preservation goals are not being achieved.

SECTION 2.7

Existing Draft Plan Language:

Encourage the development of companion units in lower-density areas to provide additional housing options, support co-generational living, and identify opportunities for low-income homeowners to help meet their mortgage obligations.

Suggested Language:

Identify and remove unnecessary zoning, permitting, design, parking, fee, and other regulatory barriers that impede the creation of companion units. The City shall establish clear and streamlined approval procedures, reasonable and predictable permitting timelines, and readily accessible guidance for homeowners seeking to add companion units.

Develop targeted technical assistance, financing, fee-reduction, and other incentive programs to make companion units financially feasible for low- and moderate-income homeowners, including homeowners who may lack access to conventional financing.

Establish measurable annual goals for companion-unit applications, approvals, permitting timelines, and completed units, including goals for participation by low- and moderate-income homeowners. Relevant departments shall report annually on progress toward those goals and identify regulatory, financial, or administrative barriers that continue to inhibit production.

If established production or permitting goals are not met, the responsible City departments shall identify the causes and develop a corrective action plan, including proposed regulatory changes, process improvements, additional financial assistance, or other measures necessary to increase companion-unit production.

SECTION 2.10

Existing Draft Plan Language:

Respect community history and ties; seek to preserve Mid-City residents' ability to continue living in the community. Strive to protect small and local businesses in the community.

Suggested Language:

Protect and strengthen the ability of current Mid-City residents to remain in their homes and communities as neighborhoods grow, housing is developed, and public and private investment occurs. Give particular attention to residents at heightened risk of displacement, including low- and moderate-income households, renters, seniors, families with children, and long-term residents.

Implement and maintain programs, policies, and regulatory tools designed to prevent involuntary displacement and promote long-term housing stability. These measures may include tenant protections, preservation of existing affordable and naturally occurring affordable housing, homeowner assistance, rehabilitation assistance, property-tax, and foreclosure prevention programs where authorized by law, affordable housing production, and targeted financial or technical assistance.

Establish measurable indicators of residential stability, including changes in rents and housing costs, eviction and displacement trends, loss of existing affordable units, affordable housing production and preservation, and participation in housing-stability programs. The City shall report periodically on these indicators and assess whether existing policies are adequately protecting residents from displacement.

When monitoring demonstrates significant displacement pressures or failure to meet established housing-stability and preservation goals, the City shall prepare and implement a corrective action plan identifying additional programs, funding, regulatory changes, or other interventions necessary to address the identified impacts.

SECTION 2.11

Existing Draft Plan Language:

Work with development applicants to ensure that tenants are provided with extended notice and options to return to new affordable homes to the maximum extent feasible when demolition of existing homes is proposed.

Suggested Language:

Protect tenants from displacement when development requires the demolition, substantial rehabilitation, or temporary vacancy of existing residential units. Require development applicants to provide affected tenants with extended advance notice, meaningful relocation assistance, and, where legally permissible, an enforceable

opportunity to return to replacement housing that is affordable to the displaced household.

As a condition of approval for applicable development projects, applicants shall prepare and implement a Tenant Relocation and Right-to-Return Plan before displacement occurs. The plan shall identify affected households and establish notice requirements, relocation assistance, moving and related expenses, temporary housing assistance where necessary, procedures for maintaining contact with displaced tenants during construction, and the terms under which tenants may return to the completed development.

Replacement housing offered through a right-to-return program should, to the greatest extent legally permissible, be comparable in size and accessibility to the unit lost and affordable to the returning household. Displaced tenants shall receive priority for qualifying replacement units before those units are offered to other applicants.

Development approvals involving the demolition of occupied housing shall clearly identify the number and affordability of units being removed, the number and affordability of replacement units, the number of households expected to be displaced, and the measures being taken to minimize permanent displacement.

Tenant relocation, replacement-housing, and right-to-return requirements shall be incorporated into enforceable conditions of approval or other binding agreements where legally permissible. Applicants shall document compliance at established project milestones, and the City shall designate a department responsible for monitoring compliance and responding to tenant complaints.

Failure to comply with applicable tenant-protection requirements may result in withholding subsequent discretionary approvals or permits, suspension of applicable City assistance or benefits, financial penalties, or recapture of City benefits where authorized by law, and other enforcement remedies available to the City.

Periodically report on the number of households displaced by approved development projects, the relocation assistance provided, the number of households exercising a right to return, and the number that successfully return to affordable replacement housing.

SECTION 2.12

Existing Draft Plan Language:

Support community empowerment initiatives, such as the community acquisition/land trust and other programs to increase homeownership opportunities for residents in the community.

Suggested Language:

Expand community ownership and wealth-building opportunities for Mid-City residents by actively supporting community acquisition, community land trusts, limited-equity and shared-equity ownership models, first-time homebuyer programs, and other strategies that create and preserve affordable homeownership opportunities for residents of the community.

Identify and deploy appropriate financial, regulatory, technical assistance, and land-use tools to expand community ownership and affordable homeownership. These tools may include acquisition and rehabilitation financing, down-payment assistance, favorable financing, technical assistance, partnerships with community-based organizations, and the disposition or long-term lease of publicly owned property for qualifying affordable ownership opportunities where legally permissible.

Establish clear procedures and criteria for supporting community land trusts and other community-based ownership entities seeking to acquire residential property, particularly properties at risk of displacement, conversion, foreclosure, or loss of affordability.

Programs shall prioritize creating long-term or permanently affordable ownership opportunities and reducing barriers faced by low- and moderate-income households that would otherwise be unable to purchase and retain a home in the community.

Organizations, developers, or property owners receiving City funding, publicly owned land, below-market financing, fee reductions, or other discretionary public benefits for community ownership or affordable homeownership shall enter into enforceable agreements establishing affordability requirements, eligible beneficiaries, performance milestones, reporting obligations, and the duration of required affordability.

If established community-ownership and homeownership goals are not being met, the City shall identify barriers to participation and adopt a corrective action plan that may include additional funding, revised program requirements, expanded technical assistance, or other measures necessary to improve results.

SECTION 2.13

Existing Draft Plan Language:

Support the production and preservation of affordable housing by providing a range of housing densities and types that promote community stability and housing security, encourage long-term residential investment, in compliance with the City's affordable housing policies and programs.

Suggested Language:

Promote and facilitate the production, preservation, and long-term affordability of housing for low- and moderate-income households by providing for a range of housing densities, types, and ownership and rental opportunities that strengthen community stability,

housing security, and long-term residential investment, consistent with the City's affordable housing policies and programs.

Use available land-use, regulatory, financial, and public-investment tools to increase the production and preservation of affordable housing. These tools may include appropriate increases in allowable residential density, affordable housing incentives, publicly owned land, acquisition and rehabilitation financing, preservation programs, fee reductions or deferrals, expedited permitting, and partnerships with nonprofit and community-based housing organizations.

In areas where additional residential density or development capacity is provided, the City shall evaluate both the opportunity to produce additional affordable housing and the potential loss or displacement of existing affordable and naturally occurring affordable housing. Development policies shall seek to achieve a net increase in affordable housing while minimizing the demolition, conversion, or loss of existing affordable units.

Establish measurable affordable housing production and preservation goals, including the number and affordability levels of new units produced, existing affordable units preserved, naturally occurring affordable units protected or acquired, and units lost through demolition or conversion. Progress toward these goals shall be reported periodically.

Developments receiving City funding, publicly owned land, density or zoning incentives, fee reductions, tax benefits, expedited processing, or other discretionary public benefits shall comply with applicable affordable housing requirements and any additional affordability commitments established as conditions of those benefits.

Affordable housing obligations shall be incorporated into enforceable conditions of approval, regulatory agreements, deed restrictions, or other binding instruments where legally permissible. These agreements shall specify affordability levels, duration of affordability, applicable performance milestones, reporting requirements, and remedies for noncompliance.

If affordable housing production or preservation goals are not being achieved, or if the community experiences a significant net loss of affordable housing, the City shall identify the causes and adopt a corrective action plan that may include additional funding, revised development incentives, strengthened preservation measures, regulatory changes, or other actions necessary to improve performance.

SECTION 2.14

Existing Draft Plan Language:

Encourage opportunities for generational wealth through affordable home ownership opportunities for local residents.

Suggested Language:

Expand opportunities for local residents to build and retain generational wealth through affordable and sustainable homeownership, with particular emphasis on creating pathways to ownership for low- and moderate-income households and residents who have historically faced barriers to homeownership.

Develop and maintain programs and partnerships that expand access to affordable homeownership, including first-time homebuyer assistance, down-payment and closing-cost assistance, favorable financing, community land trusts, limited-equity and shared-equity ownership models, acquisition and rehabilitation programs, and other mechanisms that reduce financial barriers to ownership.

Support existing low- and moderate-income homeowners in retaining their homes and building equity over time through foreclosure-prevention assistance, rehabilitation financing, financial counseling, and other appropriate programs designed to prevent involuntary loss of homeownership.

Establish measurable goals for affordable homeownership, including the number of local households assisted in purchasing homes, the income levels of households served, affordable ownership units created or preserved, and the number of participating households that remain homeowners over time. The City shall periodically report on progress toward these goals.

Developers, lenders, nonprofit organizations, or other entities receiving City funding, land, financing, or discretionary incentives to provide affordable homeownership opportunities shall enter into enforceable agreements establishing affordability requirements, eligible beneficiaries, performance milestones, reporting obligations, and applicable resale or equity-sharing requirements.

If established affordable-homeownership goals are not being achieved, the City shall identify barriers to participation and adopt a corrective action plan that may include increased financial assistance, revised eligibility or program requirements, additional partnerships, or other measures necessary to expand sustainable homeownership opportunities for local residents.

SECTION 2.15

Existing Draft Plan Language:

Support inclusion of onsite very-low and low-income affordable housing within market-rate residential and mixed-use projects rather than paying.

Suggested Language:

Prioritize and require, where legally permissible, the inclusion of very-low- and low-income affordable housing units within market-rate residential and mixed-use developments rather than the payment of in-lieu fees or provision of affordable units at an offsite

location. The objective is to create economically inclusive developments, expand access to neighborhood opportunities and amenities, and ensure that affordable housing is produced concurrently with market-rate development.

Establish onsite production of required affordable housing as the preferred and presumptive means of satisfying applicable inclusionary housing obligations. Affordable units shall be integrated throughout the development and, to the extent legally permissible, provide residents with comparable access to entrances, common areas, amenities, open spaces, and other facilities available to market-rate residents.

Periodically report on the number of market-rate and mixed-use projects subject to affordable housing requirements; the number, affordability level, and location of affordable units produced onsite; the number of projects permitted to use alternative compliance mechanisms; the amount of in-lieu fees collected; and the number and timing of affordable units ultimately produced with those funds.

Onsite affordable housing requirements and approved alternative compliance obligations shall be incorporated into enforceable conditions of approval, regulatory agreements, deed restrictions, or other binding instruments. These agreements shall specify the number and affordability level of required units, applicable income restrictions, duration of affordability, construction and occupancy deadlines, reporting requirements, and remedies for noncompliance.

Failure to comply with applicable affordable housing requirements may result in financial penalties, withholding of discretionary approvals or City benefits, enforcement of affordability restrictions, recapture of City assistance, or other remedies authorized by law.

SECTION 4.6

Existing Draft Plan Language:

Support coordinated efforts and collaboration to improve the community food environment and preserve local food growing hubs.

Suggested Language:

Support coordinated efforts and collaboration to improve the community food environment and preserve local food growing hubs, including established neighborhood-based food resources such as New Roots Community Farm.

Recognize existing community farms and gardens as essential community amenities that improve access to fresh and healthy food, strengthen social connections, preserve green space, and contribute to community resilience.

Prioritize the long-term preservation and continued community use of existing food-growing hubs when evaluating land use changes, development, public investment, and other actions that could affect these sites. Where potential impacts are identified, coordinate with community growers and local organizations to identify strategies that support continued agricultural use and community access.

SECTION 4.12

Existing Draft Plan Language:

Prioritize South Chollas Landfill remediation and restoration to a healthy landscape.

Suggested Language:

Require appropriate environmental assessment, investigation, and remediation whenever industrial, heavy-commercial, manufacturing, automotive, storage, or other land uses with the potential for soil, groundwater, vapor, or other environmental contamination are converted to residential, mixed-use, childcare, recreational, or other sensitive uses.

This requirement shall apply throughout Mid-City and shall not be limited to South Chollas or other specifically identified areas. The City shall identify other locations where historic or existing land uses create a reasonable potential for contamination and ensure that redevelopment of those properties adequately protects future residents, workers, and surrounding communities.

Before approving residential, mixed-use, or other sensitive development on a site with existing or historic potentially contaminating uses, the City shall require an appropriate environmental site assessment and, where warranted, additional testing of soil, soil vapor, groundwater, buildings, or other potential pathways of exposure.

Where contamination is identified, the property owner or development applicant shall prepare and implement a remediation plan consistent with applicable local, state, and federal environmental and public-health standards. Remediation shall be completed, or appropriate enforceable controls shall be established, before residential occupancy or other sensitive use of the property.

Coordinate with appropriate environmental and public-health agencies and maintain clear procedures for determining when environmental investigation, remediation, mitigation, or ongoing monitoring is required.

SECTION 5.58

Existing Draft Plan Language:

Involve the community in the guidance and development of emerging cultural districts and explore processes for acknowledging their voices in the recognition of anchor institutions, businesses, and events.

Suggested Language:

Involve the community in the guidance and development of emerging cultural districts and corridors, including a community-led process to identify and formally recognize a Latine cultural corridor that reflects the history, businesses, institutions, gathering spaces, and cultural life of Central American and Latino communities in Mid-City.

Identify anchor institutions, legacy and culturally significant businesses, community-serving organizations, public gathering spaces, events, artwork, and other cultural resources that contribute to the corridor's identity, and establish strategies to retain, support, and reinforce these resources as investment and development occur.

Coordinate cultural district planning with small-business stabilization and anti-displacement strategies so that the businesses and institutions that give these areas their cultural significance can remain in place and benefit from neighborhood investment.

Incorporate community-informed signage, wayfinding, public art, gateway elements, and interpretive features that increase visibility and celebrate the corridor's cultural identity.

SECTION 6.1

Existing Draft Plan Language:

Support implementation of mobility improvements in Mid-City to leverage opportunities to bundle Complete Streets improvements with ongoing roadway maintenance activities and future capital improvement projects.

Suggested Language:

Support implementation of a connected multimodal transportation network that gives residents safe, practical, and reliable options to walk, roll, bike, take transit, use microtransit, and drive based on their needs and destination. Complete Streets improvements should be incorporated into roadway maintenance and capital improvement projects wherever feasible rather than implemented as isolated improvements.

Prioritize closing gaps between walking, bicycling, transit, and microtransit networks so that these modes function as realistic options for everyday trips. Improvements should strengthen connections to schools, jobs, businesses, parks, community facilities, transit stops, and other neighborhood destinations.

Evaluate transportation investments not only for their effects on individual modes, but for their ability to improve overall mobility, expand transportation choices, and reduce the number of trips for which driving is the only practical option.

SECTION 6.12

Existing Draft Plan Language:

Coordinate with SANDAG and MTS to support transit service improvements, including frequency, coverage, amenities and all-door boarding that respond to future community growth and demand.

Suggested Language:

Coordinate with SANDAG and MTS to support transit service improvements, including frequency, coverage, amenities, and all-door boarding, and strengthen connections between transit, walking/rolling, bicycling, and microtransit so that residents have practical and reliable alternatives for everyday trips.

Prioritize mobility investments that close gaps in the transportation network, improve safety and comfort, and strengthen connections to jobs, schools, businesses, parks, transit, and other community destinations, particularly where existing conditions make driving the most practical option.

Establish measurable goals for improving access to frequent transit, first- and last-mile connections, and other non-driving travel options. Relevant agencies shall periodically report on progress and identify remaining barriers that limit residents' ability to use these options. Mobility improvements should be evaluated for their ability to expand transportation choices and reduce vehicle trips and traffic pressure while maintaining safe and efficient access for people who continue to drive.

Thank you for considering these recommendations as the Mid-City Communities Plan Update moves forward. We appreciate the City's continued engagement with City Heights residents and look forward to remaining involved throughout the remainder of the planning process.

Sincerely,

SR-15 Transportation Equity and Affordable Housing (TEAH) Task Force
City Heights Built Environment Team (BET)
With support from City Heights Community Development Corporation

Fairmount Park Neighborhood Association

1829 Parrot Street
San Diego, CA 92105

(619) 266-7161
Fairmountpark92105@yahoo.com

August 20, 2026

To: City of San Diego Planning Department

Via Email: planmidcity@sandiego.gov CC: chapc.chair@gmail.com

From: Russ Connelly, President, FPNA

Subject: **Mid City Community Plan Update – Corrections to draft document**

Page 47, Paragraph 2: Correct twentieth century to twenty-first century.

Page 62 under Hazardous Materials: Add former illegal historic burn ash dump sites.

Page 66 (Street Tree Map-figure 4-2): With the exception of Home Avenue, Fairmount Park does not generally have parkways making street trees impracticable. Current Urban Greening Project is planting street trees where ROW exists. This should be removed from the diagram.

Page 83 (Urban Design Framework-Study Area 11): Transit does not run west of Gateway Drive in Fairmount Park. This area needs to be corrected on the diagram. Ash Street in Bayridge is a dead-end street. Any potential bridge crossing over SR-15 for a bike/pedestrian route would be done by SANDAG and is not in any future designated plan. Should be removed. Current designation along Home Avenue is Light Industrial/Commercial west of Gateway Drive due to prior soil contamination in the area (historic burn ash dumps) and is unsuitable for upgrade to mixed use development. Potential park on Ash Street west of Home Avenue is on a hillside grade and abuts Cal Trans ROW. No mention is made of potential redevelopment of abandoned institutional use property (former Police Pistol Range) along Federal Blvd. This **entire** study area is highly flawed and should be removed or re-evaluated (see page 103 comments and clarifications below).

Page 87 Privately Owned Public Spaces: A local example should be included here for reference. Specify if any currently exist in the Mid-City area.

Page 89, Paragraph 1: Replace reference to I-5. It is Interstate-805.

Page 100: Diagram is incorrect and duplicated as Euclid Avenue South plan area.

Page 103 "Neighborhood Connection to Home Avenue": This is on a severe hillside and canyon that cuts through an area that was formerly a burn ash dump. Even though it is a "Paper Street" (Hazel), it should be not built due to the excessive grade and potential contamination that could be raised by building a natural path through the area. Security issues are also raised by having a remote path to the back of a school. The Joint Use Park (Rowan) will be used by the public only during limited hours as well. No attempt was made to verify the physical suitability of this 'path' and no attempt was made to seek input from the immediate neighborhoods of Fairmount Park and Bayridge. This should be eliminated from the diagram. (see comments above about page 83 for additional related concerns and clarifications.)

STATEMENT BY THE KENSINGTON TALMADGE COMMUNITY ASSOCIATION ON THE MID-CITY PLAN

The Kensington Talmadge Community Association ("KTCA") is a community organization that has represented the Kensington community since 1941. We have over 200 members and our mission is to be the community resource for all things Kensington.

The following statement has been endorsed by the KTCA Board of Directors as our official statement and position regarding the current version of the Mid-City Plan:

The KTCA has several concerns with the Mid-City Plan, and is in general agreement with the official response provided by the Kensington Talmadge Planning Group, as well as feedback recently provided at their September 21st meeting, which was also attended by City personnel involved in this process.

In Kensington, we take wildfire seriously because the risk is very real.

Our community is bordered on three sides by steep, dry, heavily vegetated canyons, and the City's own Draft Mid-City Communities Plan acknowledges that more than half of the Mid-City area lies within what is called a Very High Fire Hazard Severity Zone. That is the highest risk designation possible.

At the same time, this plan proposes significant increases in housing and population density. We are not here to argue against more housing, we are presenting an argument asking that our life-safety infrastructure and evacuation capacity keep pace with growth.

We ask our City leaders a very fundamental question regarding the Mid-City Plan:

Before we substantially increase the number of people who may someday need to evacuate Kensington, or other Mid-City Communities, shouldn't we first demonstrate that the people who live here today can get out safely — while firefighters and other emergency responders can simultaneously get in?

Our streets are narrow. Many have cars parked on both sides. A situation recently made much worse by the installation of parking meters on Adams Avenue. We have grossly constrained evacuation routes because of the surrounding canyon system. During a major wildfire, thousands of residents could be trying to leave at exactly the same time that fire engines, police vehicles and ambulances are trying to come in.

That is not simply a traffic problem.

It is a life-safety issue for the residents.

The Plan itself recognizes this concern. It says additional fire resources *"MAY"* be required as development occurs, including new or expanded fire stations and additional staffing. The Draft Plan also calls for emergency planning to ensure safe and efficient evacuations during fire emergencies.

Those are important acknowledgments.

But what we have not found in this plan is equally important: a detailed evacuation analysis demonstrating that our existing street network can safely accommodate even today's population during a major wildfire, let alone the additional population envisioned by this plan.

We respectfully ask the Mid-City city planners:

Where is the evacuation-time analysis?

Where is the study of choke points and bottlenecks?

Where is the mitigation plan for these bottlenecks and choke points?

Where is the analysis of residents evacuating while emergency vehicles are simultaneously trying to enter?

And what happens when those streets, already narrowed by parked cars, become overwhelmed by residents trying to evacuate?

We have already seen what that can look like. During the 2025 Palisades Fire, evacuation routes became gridlocked. People abandoned their vehicles and fled on foot, while abandoned cars had to be moved with Bulldozers so emergency vehicles could get through. Locally the Montezuma fire two years

ago encountered gridlock situation with reports of some residents fleeing on foot. This illustrated the need for much more robust evacuation routes.

We should learn from the Palisades tragedy and our very own near miss with the recent Montezuma fire, rather than assume it cannot happen here.

If the City has already completed a comprehensive evacuation analysis for Kensington and the other affected Mid-City communities, we respectfully ask you to share it with us. We would like to see it. If it has not, we believe it should be completed before substantial additional density is approved in these very high-fire-hazard areas.

We are not asking the City to stop planning for the future. But because climate change, and the new reality we find ourselves in, with extreme weather conditions, and the ever growing risk and severity of wild fires, we are asking the City to consider the lives and safety of its existing residents with at least the same level of priority it gives to planning for growth.

Thank you.

Thomas Hebrank
President, Kensington Talmadge Community Association

September 18, 2026

The City of San Diego Mid-City Communities Plan Update Staff
Mid-City Communities Plan Update Working Group Members
City Planning Department
City of San Diego
1200 Third Avenue, Suite 1600
San Diego, CA 92101

Re: Support for the First Draft Mid-City Communities Plan's Treatment of Chollas Triangle and the Lea Street Extension

Dear Mid-City Communities Plan Update Staff and Working Group Members,

We write on behalf of the Partnership for the Advancement of New Americans (PANA), concerned community residents, and the undersigned good government, civil rights, environmental justice, advocacy, and ethnic-based direct service community organizations to express our support for the First Draft of the Mid-City Communities Plan (released August 10, 2026), and specifically to commend City staff for the direction taken in the Chollas Triangle Study Area. In October 2025, we wrote to oppose the extension of Lea Street as it then appeared in the Mid-City Ideas Report (Draft August 2025), which proposed a new vehicular street through the Chollas Triangle. We are pleased to see that the First Draft reflects the substance of the community's requests, and we write now to affirm our support and to urge the City to strengthen and carry this forward into the Final Draft.

PANA remains in active partnership with City staff on the Global Village: Refugee and Immigrant Cultural Hub and Housing Campus, and we are grateful for the continued collaboration with the Planning and Development Services Department, The Mid-City Communities Plan Working Group, and community partners throughout this process. The First Draft's approach to Chollas Triangle is an important and welcomed step toward realizing the community vision of zero pedestrian deaths and where our children, families, and seniors can walk and bike safely to school, to the park, and to each other.

The changes we support:

1. Lea Street is no longer shown as a vehicular through-street. Figure 5-4 (Chollas Triangle Study Area) now recommends the City "consider [an] alternative option to limit Lea St extension to bike/ped access-only." This is precisely what our October 2025 letter requested replacing the solid blue "New Streets" line through the Chollas Triangle with a pedestrian and bicycle connection instead of a new autocentric collector street. Consistent with this, Figure 6-4

(Recommended Street Classifications) no longer carries Lea Street as a classified vehicular collector or arterial.

2. Chollas Parkway becomes a neighborhood park, not a cut-through street. The Parks and Public Facilities chapter states that the “Chollas Triangle Neighborhood Park would replace Chollas Parkway between 54th Street and University Avenue,” with play areas, walking paths, open turf, a community gathering space and picnic areas. This directly addresses our public safety concerns about introducing a high-speed cut-through corridor immediately adjacent to a planned park serving children and families.

3. Bicycle and streetscape connectivity is prioritized over new vehicular capacity. The Urban Design chapter's description of the Chollas Triangle Study Area now emphasizes “bicycle and streetscape improvements” to “increase connectivity to other parts of Mid-City,” rather than framing new vehicular streets as the primary connectivity solution, as the August 2025 Ideas Report had done.

As this moves to the Second Draft, we have two additional requests.

(1) Figure 5-4 currently frames the bike/ped-only treatment of Lea Street as an option to “consider,” rather than as a settled recommendation. Given the safety record on University Avenue, including the November child fatality cited in our prior letter and in subsequent community testimony through 2026, and given the disproportionate burden a vehicular extension would place on the Global Village site, we respectfully ask that the Second Draft **adopt the bike/ped-only treatment of Lea Street as the Plan's firm recommendation,** not as one alternative among others.

(2) The Global Village will bring online 144 large family and deeply affordable units, a health center, a nonprofit collaborative hub space, and facilities designed to serve as a regional resiliency center during emergencies. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site **include safe, signalized crossings of University Avenue and 54th Street,** consistent with the Plan's own Vision Zero and Complete Streets goals.

We appreciate the City's responsiveness to the community's sustained advocacy on this issue over the past year, and we look forward to continuing to work in partnership with the City on a Second Draft that locks in a vision prioritizing human safety, equitable investment, and community-led development in the Chollas Triangle.

We appreciate your attention to this important issue.

Sincerely,

Ramla Sahid, Executive Director, PANA

Co-signed:

Aja Project
Circulate
Climate Action Campaign
Doh Doh Coffee
Eritrean Community Services SD
The Global Arc
Groundwork San Diego
Horn of Africa
Karen Organization of SD

Kind Hearts San Diego
Majdal Center
Meliora Essence (ME)
Our Time To Act
Pan African Family Union Inc
Pillars of the Community
Somali Bantu Community of SD
Somali Youth United
Union of Pan Asian Communities (UPAC)
Viet Voices
Youth Will

Cc:
The Honorable Mayor Todd Gloria
The Honorable Council President Joe LaCava
The Honorable Councilmember Sean Elo-Rivera

San Diego Mountain Biking Association

October 22, 2026

Planning Department, City of San Diego 202 C Street San Diego, CA 92101

Via email: PlanMidCity@sandiego.gov

JOAvila@sandiego.gov

Re: Comments on the First Draft Mid-City Communities Plan: Trails, Open Space and Canyon Connectivity

Dear Planning Department Staff:

Thank you for the work that has gone into the First Draft Mid-City Communities Plan and its Park and Recreation Inventory, and for the opportunity to comment. We recognize that the formal comment period closed on October 2, 2026, and we respectfully ask that these comments be considered as you prepare the Second Draft expected this winter. Our comments focus on trails within open space parks and canyons, and on how the Plan can better serve mountain bikers, hikers, runners, and other trail users. We also understand that the Citywide Trails Master Plan will be the overriding policy document for trails in all community plans, as Note 9 of the Inventory states, and we ask that the Mid-City Plan be written to work with it.

What we are encouraged by

- Chapter 6 (p. 121) defines trails as walkways for "walking and riding bikes."
- Chapter 7 includes Policy 7.20 (trail connections adjacent to new development and recreational easements), Policy 7.21 (open space connections with trailheads for bike and pedestrian access), and Policy 7.28 (shared-use paths in SDG&E easements).
- Figure 7-1 shows existing trail networks in the City Heights canyons and at Chollas Lake, along with potential trails along Chollas Creek and in Kensington-Talmadge.
- The Inventory proposes about 2 miles of new and relocated trail along Chollas Creek (the Oak Park Trail), a 4-mile Kensington Hillsides Loop Trail, and the Cherokee Point Open Space (about 6.4 acres) with half a mile of trail, two trailheads, and a segment of the Cherokee Point Loop Trail.
- The Inventory notes that Chollas Lake Regional Park already has a dirt path used for walking, jogging, and cycling.
- The Plan lists pump tracks as a regional park facility (p. 134–135), and the Inventory says specialty recreation opportunities "shall also be explored" at South Chollas Lake Park.
- The Central Avenue Mini Park expansion would create a half-mile multi-use path crossing the SR-15 bridge, an example of the kind of non-motorized freeway crossing the Plan should pursue elsewhere.

San Diego Mountain Biking Association

Concerns

1. Mountain biking is not specifically addressed. The term does not appear in the draft Plan or the Inventory. Without it, trail recreation reads as walking and hiking, and mountain biking could be excluded by default rather than by decision where applicable.

2. Trail use types are not identified. Figure 7-1 does not distinguish pedestrian-only, shared-use, and bike-compatible segments, so the Plan gives little guidance on where bikes are intended. We anticipate that trail use types and standards will be clear and included in the Citywide Trails Master Plan, and we ask that Mid-City segments be flagged for bike-use evaluation in that process.

3. The trail clusters are disconnected. The City Heights canyons, Chollas Lake, and the Kensington Hillsides appear as separate systems, with only short connectors shown. Freeway crossings are limited to a commitment to "evaluate" them (Policies 6.18 and 6.19). We recommend language that clearly identifies how the planned bicycle street network and future easements (SDG&E or others) can connect the trails and open space areas.

4. Trailhead and trail upgrades do not account for bike use. The Inventory lists benches, signage, fencing, and trash receptacles for the City Heights Canyons Loop trailheads, but no bike parking or repair stations, and no statement of which uses each trail serves.

5. Bike-oriented recreation is not included in park programming. The proposed amenities for new neighborhood parks and for parks within new development do not include pump tracks, skills areas, or similar facilities, and it is unclear how such facilities would be scored under the Recreation Value Points system.

Requests for the Second Draft

1. Add a Chapter 7 policy recognizing mountain biking and other shared-use trail recreation where consistent with the MSCP, Environmentally Sensitive Lands regulations, and applicable resource management plans.
2. Classify trail segments on Figure 7-1 by permitted use (pedestrian-only, shared-use, or bike-compatible). SDMBA supports multi-use trails in most circumstances. We would also strongly support a mountain bike specific riding area (directional trails and mountain bike optimized design - berms, jumps, skill features, etc) at South Chollas Lake Park or in the proposed Cherokee Point Open Space.
3. Commit to a study of trail-user crossings of I-8, I-805, SR-15, and SR-94, with priority locations, using the Central Avenue Mini Park / SR-15 bridge connection as a model.
4. Add language on trail maintenance, fire access, seasonal closures, and ranger or volunteer stewardship, including the role of the proposed Chollas Creek Ranger Station.
5. For the Oak Park Trail along Chollas Parkway Open Space (currently in the design phase), evaluate a main route for all users with a parallel natural-surface trail that would

accommodate mountain bikers (the "Singletrack Sidewalk" concept), consistent with Multi-Habitat Planning Area regulations.

6. Amend the Park and Recreation Inventory to:
    - name pump tracks, bike skills areas, and a mountain bike trail system (directional trails, table-top jumps, berms, skill features, etc.) as specialty recreation to be explored at South Chollas Lake Park, where the existing RC Flyers runway is a precedent for specialty uses on the site;
    - identify the proposed Cherokee Point Open Space (about 6.4 acres) as a candidate for a small mountain bike specific trails area, in addition to its planned loop trail segment and trailheads.
    - add bike racks and repair stations to potential trailhead features for the City Heights Canyons Loop and other trailheads;
    - retain and recognize cycling on the Chollas Lake Regional Park trail;
    - evaluate the Oak Park Trail, Kensington Hillsides Loop Trail, and Cherokee Point Loop Trail for multi-use, bike-compatible design, including the Kensington Aldine Drive recreation easement; and
    - clarify how Recreation Value Points apply to bike parks, pump tracks, and mountain bike trails.
7. Include specific design guidance for any bike park or pump track:
    - **Siting:** prioritize previously disturbed land outside the Multi-Habitat Planning Area. At South Chollas Lake Park, evaluate landfill cap, settlement, and drainage constraints early. Bike Parks and pump tracks can be designed to fit in non-traditional spaces that might not be suitable for traditional park amenities.
    - **Access:** locate near transit and the planned bicycle network, with bike parking and safe crossings.
    - **Range of users:** include beginner and youth zones, a progression to advanced features, and adaptive options.
    - **Community involvement and stewardship:** engage neighbors, schools, and local riders in design, and support volunteer stewardship and programming such as clinics and youth events.
    - **Operations and maintenance:** address noise, dust, lighting, drainage, and erosion controls, and identify who will maintain the facility and how it may be funded.
    - **Public safety:** as Note 7 of the Inventory recognizes, well-managed, publicly accessible space helps prevent unauthorized encampments. Increased managed recreation in these areas could help discourage camping in open space, and should be paired with outreach and services.
    - **Implementation and Construction:** We encourage the city to only use qualified designers and builders for these types of projects who have direct experience building bike park and pump track facilities.

San Diego Mountain Biking Association

8. Identify funding sources for trails and bike facilities in the Implementation chapter, such as developer contributions, easements, and grants and the potential for public/private partnerships.

We welcome additional opportunities as this plan moves forward to provide input on trails, connectivity, and bike park and pump track amenities, and we would be glad to meet with staff.

Thank you for your consideration.

Sincerely,

Peter Hulburt, Executive Director

San Diego Mountain Biking Association

peter@sdmba.com

REMNANT CHURCH

October 1, 2026

Alex Frost
Principal Planner
City of San Diego Planning Department
202 C Street, M.S. 413
San Diego, CA 92101

RE: Letter of Support for Mid-City Communities Plan Update

Dear Mr. Frost,

On behalf of Remnant Church San Diego and its 350 members, I am writing to express our strong support for the first draft of the Mid-City Communities Plan Update.

San Diego is facing a housing supply shortage and is still not building enough new homes to meet the demands of the Regional Housing Needs Assessment (RHNA). It is imperative that San Diego plan for and facilitate the expansion of housing opportunities of all types.

Meeting San Diego's housing needs starts with creating community plans that allow the necessary housing to be built. Approving the Mid-City Communities Plan Update, which adds the potential for up to 42,000 new residential units, is an important step toward creating a meaningful pathway for San Diego to meet its housing needs.

This plan update provides an opportunity to create and foster vibrant communities where housing can be attainable for working families. Remnant Church San Diego and its 350 members support this letter and encourage the San Diego Planning Commission and City Council to approve the Mid-City Communities Plan Update.

Sincerely,

Pastor Jesus Sandoval
Senior Pastor

3060 54th St. San Diego, Ca 92105
Email: pastorsandoval98@gmail.com

Calvary Evangelical Lutheran Church
3060 54th Street
San Diego, CA 92105
619.582.5581

30 September 2026

Alex Frost
Principal Planner
City of San Diego Planning Department
202 C Street, M.S. 413
San Diego, CA 92101

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Meeting San Diego's housing need starts with creating community plans that adequately allow for necessary housing to be built. Approving the Mid-City Communities Plan Update, which adds the potential for up to 42,000 new residential units, is the first step in creating a meaningful pathway for San Diego to meet its housing needs.

This plan update provides an opportunity to create and foster vibrant communities where housing opportunities can be attainable for working families. I strongly encourage the San Diego Planning Commission and City Council to support the Mid-City Communities Plan Update.

Sincerely,

Richard W. Vevia Jr

The Rev. Dr. Richard W. Vevia, Jr.

Senior Pastor

619.318.2993 (c)

October 2, 2026

Alex Frost
Principal Planner
City of San Diego Planning Department
202 C Street, M.S. 413
San Diego, CA 92101

RE: Letter of Support for Mid-City Communities Plan Update

Dear Mr. Frost Frost,

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San Diego is facing a housing supply shortage and is still not building enough new homes to meet the demands of the Regional Housing Needs Assessment (RHNA). It is imperative that San Diego plan for and facilitate the expansion of housing opportunities of all different types.

Meeting San Diego's housing needs starts with creating community plans that adequately allow for necessary housing to be built. Approving the Mid-City Communities Plan Update, which adds the potential for up to 42,000 new residential units, is the first step in creating a meaningful pathway for San Diegoto meet its housing needs.

This plan update provides an opportunity to create and foster vibrant communities. I strongly encourage the San Diego Planning Commision and City Council to support the Mid-City Communities Plan Update.

Sincerely,

Scott S. Smith

Scott S. Smith
Congregation Council Secretary
Calvary Lutheran Church
3060 54th St.
San Diego, CA
92105

October 2, 2026

Alex Frost
Principal Planner
City of San Diego Planning Department
202 C Street, M.S. 403
San Diego CA 92101

RE: Letter of Support for Mid-City Communities Plan Update

Dear Mr. Frost,

I am writing to express my strong support for t he first draft of the Mid-City Communities Plan update.

San Diego is facing a housing supply shortage and is still not building enough new homes to meet the demands of the Regional Housing Needs Assment (RHNA). It is very important that San Diego plan for and facilitate the expansion of housing building opportunities of all different types.

Meeting San Diego's housing needs starts with creating community plans that adequately allow for all the necessary housing to be able to be built. Approving the Mid-City Communities Plan Update, which adds the potential for up to 42,000 new residential units to be created, is the first step in creating a meaningful pathway for San Diego to meet its housing needs.

This plan update provides an opportunity to create and foster vibrant communities where housing opportunities can be attainable for working families. I strongly encourage the San Diego Planning Commission and City Council to support the Mid-City Communities Plan Update.

Sincerely,

Kathy Conterez
Treasurer
Calvary Evangelical Lutheran Church of San Diego

Introduction

Neighbors For A Better San Diego (NFABSD) supports the First Draft Mid-City Communities Plan Update's primary structure of revitalizing Mid-City through densified urban villages. However, it is important to take a second look at the assumptions of the plan.

The population decline of Mid-City (Table 1-2, page 9) reflects the lack of opportunity in Mid-City, not a lack of housing. The existing conditions report highlights that three times as many residents commute out of Mid-City every day as commute in. These commuters are overwhelmingly using automobiles to reach their jobs, mostly in areas north of I-8 that are poorly accessed by public transit from Mid-City.

A plan that creates a thriving Mid-City, therefore, needs to start with an economic development plan that is more than just improving neighborhood retail options for residents. The plan needs to identify a unique role for Mid-City in San Diego's economy, and the planning process has not engaged with residents, businesses, and entrepreneurs to develop ideas of what that would look like and what support would be needed from the Mid-City Plan to actualize those ideas.

Regarding the plan's goals for new housing capacity, when the existing zoning is combined with state and local zoning overrides and density bonuses, there is already much more capacity for new housing than the 95,000 unit projected by the plan.

Multi-family housing can be built in single-family zones through state and local zoning overrides. NFABSD estimates that these programs create the capacity for at least 49,000 additional new housing units throughout Mid-City.

In addition, the capacity exists through underlying zoning and bonus density programs, including Complete Communities, to add over 100,000 homes to commercial, mixed-use, and multi-family residential areas of Mid-City.

This enormous existing housing capacity, totaling approximately 150,000 new homes, doesn't just exceed the plan's projected capacity, it exceeds San Diego's entire Regional Housing Needs Allocation (RHNA).

In short, it is more important to get this plan right, including addressing the lack of an economic development plan and financing of infrastructure.

Chapter 2. Land Use and Economic Prosperity

Page 13

Planned Land Uses

The strongest reaction to the proposed land use changes in the First Draft of the Mid-City Communities Plan Update (Mid-City CPU) has come from the Kensington-Talmadge Planning Area. With the overwhelming support of the members of that community, the Kensington-Talmadge Planning Group (KTPG) has developed its own land use proposal for the community, which is summarized here:

https://c92f4009-7cd5-46ff-8380-2badc9a02bbd.usrfiles.com/ugd/c92f40_e3ea5f0edd5f48698bbb935e3032941c.pdf

Neighbors For A Better San Diego supports the KTPG Alternative Plan and offers these additional comments:

Keep the current RS zoning in Talmadge as is. This would revert the proposed changes to Low-4 (townhouses) proposed in the draft plan for all streets in Talmadge from 47th Street to 51st Street between Monroe Avenue and Madison Avenue back to existing zoning.

Leaving the zoning as is does not prohibit the construction of missing middle housing on single-family lots in Talmadge. There are a variety of state and local housing programs that permit the housing types envisioned in the plan, including ADUs (with the passage of AB 956, it is now possible to add three ADUs, by-right, to any single-family zoned property); the Starter Home Revitalization Act, which the City just adopted in the 2026 Land Development Code; the Missing Middle Townhome Ownership Act (AB 1751), which is a new program just signed by the Governor; and SB 9. These programs create for-sale housing opportunities, including small lot subdivisions (fee simple).

Further upzoning would be detrimental to achieving the goals of the plan, because formally rezoning to multi-family (instead of “single-family”) triggers another wave of overrides, including density bonus, unlimited ADUs (through San Diego’s ADU bonus program for multi-family properties), and much higher density and floor area ratio (FAR) allowances for the Starter Home Revitalization Act and Missing Middle Townhome Ownership Act.

Rezoning to Low-4, assuming a density greater than 20 dwelling units per acre, would also trigger Complete Communities Housing Solutions, unless these regulations are removed or otherwise restricted as part of the plan implementation.

Keeping the zoning as is also adheres to fire safety best practices because the streets north of Monroe are narrow neighborhood streets that would become gridlocked in the event of a

fire or other emergency. The narrow street widths also raise questions about whether development is even allowed under state fire lane restrictions on heights of new structures.

In the case of the streets from 47th Street through 49th street north of Monroe, these are within the boundaries of the Talmadge Park Estates Historic District and the upzoning proposed in the draft plan would significantly alter the integrity of the historic district. (Contrary to common misrepresentations, historic districts do not prohibit the development of additional housing, they just add a layer of review through San Diego City Planning's Historic Resources staff.)

Finally, the plan sets a goal to provide housing at all life stages. This shouldn't be implemented as mixing all housing types together on every block. Instead, there should be high-density areas for people who want immediate access to stores, transit, and other amenities, and less dense areas that better suit families. Talmadge, like other residential neighborhoods in Mid-City, has many families with young children, and their needs should be valued in the Mid-City CPU.

In Kensington, additional upzoning was added to the draft plan based on the assumption that shared bus-bike lanes qualify as SB 79 Transit Oriented Development stops. This comes from a draft SANDAG map that has not been finalized and is not based on guidance from the California Department of Housing and Community Development (HCD). In the event that a future HCD or court decision undoes the allowance of shared bus-bike lanes, will City Planning be revising its zoning in Kensington-Talmadge and elsewhere?

The KTPG Alternative Plan proposed an enhanced commercial district on Euclid between El Cajon Boulevard and Monroe Avenue. Has any consideration been given to this proposal?

Finally, the draft plan does not account for the vast amount of housing that can be built through zoning overrides, which in many areas already allows the densities proposed by the plan.

Page 14

Balanced and Equitable Communities.

It all starts with job opportunities. The Existing Conditions report clearly showed the outward migration of Mid-City residents, particularly younger residents, to areas of greater opportunity. The only way to reverse this is to create meaningful economic opportunities in Mid-City. Unfortunately, the economy of Mid-City is primarily neighborhood-serving retail, which provides limited economic opportunity for residents. The Mid-City CPU is weak on

ideas of how to change this dynamic.

Anti-Displacement and Affordable Housing

The Mid-City CPU appropriately prioritizes future housing and commercial development on transit corridors. Today, these corridors, especially El Cajon Boulevard and much of University Avenue, are dominated by single-story strip malls and automobile-focused business. Therefore, converting these streets into mixed-used commercial and housing does not carry the burden of displacing existing residents.

An excellent example is "The Teralta" at El Cajon Boulevard and Fairmount Avenue, which turned a former furniture and thrift store into affordable housing. The apartments are conveniently located across from the YMCA and in close proximity to a CVS, Hoover High School, and other nearby schools.

Planning Horizon

The population and housing increases in Table 2-2 are not realistic. Our city planning needs to adjust to the reality that San Diego, California, the United States, and even the world are facing a future where population is leveling off and then declining. Accordingly, we should zone more closely to our actual projected needs.

This concern is casually dismissed by saying that "not every parcel is going to be developed," but that ignores the negative consequences of massive overzoning.

The biggest negative effect is that massive overzoning produces scattered development of disconnected high rises (with limited commercial amenities) rather than a synergistic continuum of mixed use mid-rise apartments (with ground floor commercial). We need walkable, community-centering mixed-use density, not "infill sprawl."

Further, overzoning drives up land values and encourages land banking and property speculation, not housing.

The plan's housing goals ignore existing state and local zoning overrides and density bonuses. As mentioned previously, Neighbors For A Better San Diego estimates that within single-family zoned areas alone, these programs provide the capacity for at least 49,000 additional new housing units throughout Mid-City. In areas that are zoned for multi-family residential and commercial, there is an additional capacity to add over 100,000 homes.

Given this enormous existing housing capacity, there is not an analytical justification for broad zoning changes to Mid-City. While a case can be made that some Mid-City zoning regulations need to be modernized and made more consistent with other San Diego

communities, it is clear the existing housing capacity across existing zoning and zoning overrides is sufficient overall to meet expected needs.

Some additional page-by-page comments about the Land Use and Economic Development Elements of the plan:

Page 17

Both Low 4 and Medium 1 exceed the 20 dwelling units per acre threshold of Complete Communities Housing Solutions (CCHS), which is why NFABSD has argued for suspending CCHS as part of the implementation of community plan updates. It is especially critical in the Mid-City CPU to limit developers to revitalizing the underdeveloped commercial corridors instead of seeking out CCHS-eligible parcels that have much lower effective affordable housing requirements and are not subject to the proposed Community Enhancement Overlay Zone.

Page 20

Note that because of the extremely generous floor area ratio (FAR) allowances and no minimum unit sizes, CCHS allows even greater densities than High 2 or Urban Village.

Page 26

We agree that we need to attract customers from outside Mid-City, the question is how? The decline of Mid-City economically can be traced to the re-routing of I-8 and development of Mission Valley, which replaced El Cajon Boulevard in particular as a shopping destination for San Diegans. Without something unique, like community plazas or boutique commercial avenues, Mid-City businesses will not outgrow their role as neighborhood commercial.

Small businesses – Are there examples of types of businesses and sources of funding?

Page 29

Higher paying jobs – The failure of turning Horton Plaza into a biotech center shows that it is difficult to lure businesses to nascent job centers. There needs to be a unique focus that drives business development and regional employment.

Chula Vista, for example, is actively trying to create a regional industrial hub by combining high-tech with manufacturing.

Is there enough industrial land to relocate auto-focused businesses from transit corridors?

Has City Planning looked at creating an arts district in Mid-City instead of downtown?

Page 30

Balanced communities and equitable development – there should be a more tangible action plan to achieve this before adopting a plan update.

Thriving communities – expresses importance of having family environments, which is inconsistent with proposing high-density housing in the core of Talmadge.

The plan should allow for neighborhood densities that create the best environments for families at different life stages. Don't put all types of housing on every block.

Is there going to be a facilities financing plan to deliver the parks, libraries, community centers, and fire and police stations needed to support new residents?

Page 34

Policy 2.1 We strongly agree with this policy, but where are auto businesses going to go? These are viable businesses that pay better than retail or service jobs.

Policy 2.2 How are corner stores going to be supported? Is this even a viable model in today's retail world?

RECOMMENDATION: Support innovations such as ghost kitchens or food kit stores would provide unique benefits to neighborhood residents.

Policy 2.3 Are there details on how the plan supports shopkeeper units?

Policy 2.5 Recent state regulations, such as the Starter Home Revitalization Act, already provide for small lot subdivisions in both single-family and multi-family zones. There is no discretion for the plan to ignore these mandates or any reason to reinvent the wheel.

Page 35

Policy 2.11 Developing underutilized commercial properties particularly along transit corridors provides housing with the greatest opportunity, without displacement.

Policy 2.13 The best thing for housing affordability would be to quit turning starter homes into multi-family development opportunities where developers outbid first-time homebuyers.

Policy 2.15 The only way to get developers not to pay the in lieu fee is to make it high enough that actually building the units is the better economic option. Getting rid of CCHS would also remove its off-siting allowances.

Page 36

The connection between Mid-City and regional job centers is automobiles. In a sprawling city like San Diego, there is no viable fixed-route transit buildout that will ever compete with cars for most residents.

Chapter 3. Historic Preservation

Page 46

RECOMMENDATION: create a cultural district that can serve as a citywide destination (like Little Italy) for international cuisine, shops, and related activities.

Page 48

We strongly support adaptive reuse and encourage policies that allow what happened with The Teralta.

Page 49

Historic preservation attracts high-value residents and customers. See this PlaceEconomics report for a perspective on how historic preservation sustains the economic vitality of older communities.

https://www.sohosandiego.org/images/SanDiegoHPVitality.pdf

Page 50

Policy HP.A.2.a-c This can be done by completing the Mid-City survey which stopped at 47th street in 1996 (excluding 47th Street and areas to the east).

Policy HP.A.2.d. This should be encouraged as part of the Preservation and Progress initiative or through supplemental development regulations for Mid-City, similar to what was done in the Hillcrest Focused Plan Amendment.

Page 53

Policy 3.7 RECOMMENDATION: Add a policy to recognize state and national historic districts locally on an expedited basis, including the already designated Talmadge Park Estates Historic District and Historic Kensington when it is done.

Webster and Rolando should be prioritized for historic surveys while they are still largely intact.

Policy 3.8 How is the City proposing to get involved with education efforts? This has traditionally devolved to historic districts.

Chapter 5. Sustainability, Equity, Resilience, and Conservation

Page 56

We want to have it all, but streets are only so wide. We need to recognize and adjudicate the conflict between taking up streets with bikes and transit infrastructure versus making sidewalks wider and with street trees.

Clean and renewable energy – Should this be part of the economic development plan?

Page 58

A report from PlaceEconomics provides an excellent study of the carbon impact of different rehabilitation strategies, using the Granger Hotel in downtown San Diego as a case study.

https://www.sohosandiego.org/images/SanDiegoHPVitality.pdf

Page 59

Local food systems – Have you looked at the possibility of urban orchards, which would provide both shade and neighborhood produce?

Page 60

Nature-based Stormwater Management – We strongly agree with enhancing the role of trees in managing runoff and heat islands. However, given Mid-City's clay and sedimentary soils, how do we improve permeability of parkways to maximize stormwater absorption?

Page 63

Locating housing closer to transit means fewer trees are needed in parkways to provide a shaded pedestrian path from riders' homes to transit stops.

Fire – The draft plan calls for high density on narrow streets that lead into very high fire hazard severity zones. In some cases, these streets do not meet state fire codes for adequate fire lanes.

RECOMMENDATION: Add Supplemental Design Regulations (SDRs) with 5 foot side and rear setbacks to ensure that fire fighters have access to properties and to be consistent with zone zero and brush management standards.

Page 64

Street trees (Table 4-1) – We agree with the goal of creating varied yet coherent tree palates, as proposed in Table 4-1. For some of the tree selections, the breadth of the canopy and the potential for roots to raise sidewalks are a concern. Consider additional trees that have similar canopies and foliage to avoid monoculture, thereby promoting biodiversity and protection against disease and pests.

Page 68

RECOMMENDATION: Urban orchards (in neighborhoods)

Page 72

Reconfigure sidewalk/parkway transitions to channel rainwater into tree lined parkways. Improve parkway water collection by breaking through clay and sedimentary barriers to hold rainwater for longer periods.

Chapter 6. Urban Design

Page 81

Agree with the statement about topography, which is why it makes sense to focus development east/west along corridors rather than north/south along College Avenue or 54th Street. Euclid Avenue and Fairmount Avenue are fairly flat between El Cajon Boulevard and University Avenue, so makes sense to make that area the center of Mid-City.

Page 82

What's missing is neighborhoods for families to live in.

Page 83

Potential parks and open spaces should be coded differently, as they are in Figure 7-1 (page 139). For example, the two-dimensional projection of canyons deceptively implies that there is a lot of park space in Kensington-Talmadge, when there is no park in Talmadge and just the Kensington Park and a little pocket park by the freeway entrance in Kensington.

Page 85

Agree with statement about public spaces, but where are these going to happen?

Page 86

Types of Public Spaces – The plan calls out plazas, which is a great idea, but it's not clear whether this type of public space has been proposed in any of the study areas detailed on pages 88 through 94. For example, a plaza could feed into the proposed Teralta Park expansion (Figure 5-2) or incorporated into the conversion of the massive parking area of the shopping center at University Avenue and 54th Street (Figure 5-4) into high-density housing.

Parkways and sidewalks require a tradeoff with dedicated bike and transit lanes. Often parkways and sidewalks are what get sacrificed, even though they are much more important and utilized by residents.

Walkability is the foundation for transit usage but currently mobility options are designed to go through Mid-City, not visit Mid-City.

Consider closing side streets off of El Cajon Boulevard to create paseos for street bazaars and restaurants.

Page 87

Private property owners don't want the liability of public spaces. We need publicly owned public spaces. Perhaps developers should have to cede land to the city in exchange for upzoning (virtual land exchange).

Page 88

The massive amounts of high-density development planned between El Cajon Boulevard and University Avenue make it all the more critical to preserve pockets of single-family homes to the north and south.

Page 89

As noted above, Chollas Triangle is an ideal location for an automobile-free community plaza with mixed-use development. (also Figure 5-4)

Marketplace at the Grove could also support auto-free commercial paseos mixed with housing.

Page 90

Expanding Teralta Park and surrounding it with denser housing is a great idea. Creating a promenade/paseo for dining and retail adjoining the park would create a citywide destination and celebrate Mid-City's diversity.

Page 101

Given its historic vibe, enhancing the area around University Avenue and Euclid Avenue is a great idea, but parking for outside visitors is a huge problem.

Page 102

Figure 5-12

Given that the west side is already industrial, can this be a potential area for business incubation and clean manufacturing?

Page 104

Adams Avenue is fairly narrow for a transit and commercial corridor.

RECOMMENDATION: Include Supplemental Design Regulations with angle plane requirements and/or stepbacks to ensure it retains “main street” scale and character.

Page 112

Use stepbacks to avoid urban canyon effect and street noise.

Page 113

Policy 5.16 Is the point to create more streets so that there will be more street parking?

Going the other way, what about closing streets or using the newly created streets as vibrant pedestrian-only zones?

Parking & Vehicle Access – Good to see this is being realistically considered. Insufficient street parking is a key problem for City Heights in particular.

Sustainable Buildings – The building with the least carbon cost is the one that’s already there. Encourage adaptive reuse, following the example set by The Teralta.

Page 114

Public Art – We should go further and explore creating an arts district within Mid-City instead of on expensive sites downtown.

Policy 5.56 RECOMMENDATION: To celebrate Mid-City's diversity, create signage/banners for El Cajon Boulevard that say "The Boulevard" in different languages.

Chapter 6. Mobility

Page 126 Future Mobility Technologies

Transit across California's cities is facing economic challenges, especially bus transit. Mid-City is compact enough to have fixed bus routes that serve local circulation or downtown, but most of the job centers with well-paying jobs are north of I-8. To change how residents think about mobility options, we need modern, flexible transit systems that can adapt in real time to rider demand.

Page 127

Figure 6-4 treating Aldine/Monroe in Talmadge as a collector highlights that this is a very narrow street with no safe access for bicycles or pedestrians on either side, and which carries far too many daily commuters, well beyond its planned capacity. Much of this is due to the inefficiency of moving morning commuters from Collwood Boulevard to Montezuma Road and El Cajon Boulevard to I-15. In the case of Collwood, more than 3,000 average daily trips (ADTs) were diverted from Collwood to Aldine as a result of restrictions on the flow of traffic through Collwood.

Page 132

Ebikes are evolving as a meaningful commuter modality, but traditional (non-motor assisted) bicycles are not. In the latter case, bike lanes are primarily used for recreation and are an extremely expensive luxury that serves a very small segment of the population.

The plan puts too much emphasis on residents going somewhere else, instead of being where they are. What really matters is whether neighborhoods are being made more walkable, which may require making a street less "complete" for bikes and transit in order to make it more accommodating to pedestrians. The best, most climate friendly mobility solution is not having to leave the neighborhood for daily activities.

Policy 6.9 Allowing bikes in bus lanes either implies that bus service is slow and unreliable and will always be so, or that there will never be enough bicyclists using these lanes to obstruct the flow of what are supposed to be high-speed buses. Either way, this suggests that our Climate Action Plan is not going to reach its bike/transit goals, and we need to start from scratch with realistic modalities, such as self-driving cars and small buses that adaptively match riders and routes to destinations.

Bike lane designs are still catching up to Ebikes. A separated bike lane that is routed between a sidewalk and an automobile parking strip creates a dangerous situation because a pedestrian walking across the bike lane may step in front of a high-speed Ebike. Ebikes are both faster and heavier than traditional bikes, raising the risk of a severe accident or even a fatality in these circumstances.

Chapter 7. Parks and Public Facilities

There's not much to say about parks, because given the city's finances, there is no foreseeable future where land will be purchased for new parks, and even if there was, the city doesn't have the money to maintain and operate them.

The Parks Master Plan profoundly lowered the bar for meeting the recreational needs of San Diego's residents and yet not a single community plan update has met its park point requirements since the Parks Master Plan was adopted.

The lack of a meaningful economic development plan and the lack of future public parks and public facilities are the two biggest reasons why we shouldn't be planning on adding 90,000 more residents to Mid-City.

Note figure 7-1 (page 139) shows open space in a different color than parks, which gives people a much more realistic view of existing park conditions. This treatment should also be applied to Figure 5-1 on page 83.

Page 152

Policy 7.24 The College-Rolando Library isn't in the Mid-City planning area; it's in the College Area. Any policies associated with the library have presumably been handled already as part of the recent Collage Area plan update.

Chapter 8. Implementation

Community Enhancement Overlay Zone (CEOZ) – While the objective is admirable, relying on private property owners to be the primary source of our public spaces is problematic. They don't want the liability, and they will develop strategies that discourage outside resident use. Community spaces should welcome and build community, and private property doesn't do this.

Instead, we think of this as a trade of ground level land (for the public amenity) in exchange for the developer having more virtual land (through floor area ratio increases).

For the CEOZ to work, it is critical to eliminate Complete Communities Housing Solutions (CCHS), because CCHS is exempt from these requirements, and requires less affordable housing and other public benefits as well. The absurdly low density threshold (20 du/ac) for CCHS also rewards developers for building away from transit, not next to it, which would sabotage the walkability and transit orientation of the Mid-City plan.

Before giving away virtual land (through upzoning) to landowners, City Planning should commission an economic study to value that virtual land and determine whether the public is getting a fair return from the landowner.

There are more exotic mechanisms that could be considered for land value capture, such as air rights auctions, that would generate considerable immediate revenue for affordable housing and other public benefits, instead of just gifting virtual land to existing landowners.

Capital Improvements Program – Instead of squandering an enhanced infrastructure financing district (EIFD) on Midway Rising, why not use it to accelerate redevelopment of El Cajon Boulevard?

We recommend adding Supplemental Design Regulations with 5 foot side and rear setbacks to ensure that fire fighters have access to properties and to be consistent with zone zero and brush management standards.

Dear Mid-City Communities Plan Update Team:

I am writing as President of the Kensington Fire Safe Council regarding the First Draft Mid-City Communities Plan. The comments and specific requests made in this official ”on-record” request are exactly what I spoke about and requested of you verbally during my presentation on September 21 at the Kensington Community Church. To reiterate my overarching point from the 21st, - We believe this plan has not addressed sufficiently the life and safety impacts of existing residents, (or the added residents envisioned by the plan) in a serious and transparent effort. We believe there are serious evacuation and access implications affecting the life and safety of our residents that need to be considered as a cornerstone and primary objective of any plan for the future.

As such, confirming my requests made on Monday evening, The Kensington Fire Safe Council requests that the additional mobility and environmental work supporting the Second Draft include a quantitative, location-specific analysis of wildfire evacuation capacity and simultaneous emergency-responder access in Kensington, Talmadge and other at-risk communities in the Mid-City area.

The first draft acknowledges substantial wildfire exposure and proposes increased residential capacity, but it does not provide route-specific modeling showing whether Kensington’s constrained street network can accommodate evacuation under wildfire conditions. The statement that most proposed land-use change would occur outside the Very High Fire Hazard Severity Zone does not resolve this issue: residents may still need to travel through constrained streets and intersections, areas potentially made worse by the development and added population density envisioned by this plan. Development which is concentrated precisely in critical evacuation routes for the existing community.

We request that the analysis:

1. Evaluate Kensington (and other at risk communities like Talmadge) separately rather than relying solely on Mid-City-wide averages.
2. Compare existing conditions with reasonable buildout under the proposed land-use designations, using realistic assumptions about residents, household vehicles, visitors and on-street parking.
3. Model credible canyon-fire and wind-driven-fire scenarios, including evacuations initiated from different portions of Kensington and the possible loss or obstruction of a principal route.
4. Identify critical intersections, roadway segments and other choke points, including locations where parked vehicles or narrow roadway widths may impede evacuation or fire-apparatus access.
5. Evaluate evacuation traffic and emergency responder ingress occurring simultaneously, including the effects of disabled vehicles, roadway closures and emergency operations.
6. Address residents who may require assistance, as well as households without access to a private vehicle.
7. Report estimated evacuation clearance times, roadway and intersection constraints, assumptions, methodology and sensitivity analyses under both existing and proposed buildout conditions.
8. Identify feasible mitigations, infrastructure improvements, parking or access-management measures, operational plans and implementation triggers needed to prevent proposed growth from degrading evacuation or emergency-response performance.
9. Identify existing bottlenecks, and choke points, as well as an analysis of newly created choke points caused by the proposed development, and a specific mitigation plan to address these life safety risks impacting the community.

We also request that this work be developed in consultation with the San Diego Fire-Rescue Department and the City's Office of Emergency Services. The Kensington Fire Safe Council would welcome an opportunity to provide local support and information concerning canyon hazards, parking conditions, constrained streets and known access points.

Please include this request in the official comment record for the First Draft. Please also provide a written response addressing:

- Whether wildfire-evacuation capacity and simultaneous responder ingress will be included in the forthcoming mobility or environmental analysis;
- The anticipated scope, methodology and responsible department or consultant;
- When the analysis will be released for public review; and
- If the requested analysis will not be performed, the City's reasons for that decision and the information on which it will rely instead.

Because this analysis could affect both the proposed land-use map and appropriate mitigation measures, we ask that its scope be identified before the November 19 Planning Commission workshop and that the completed analysis be released with sufficient time for public review before adoption proceedings.

Thank you for your consideration. Please confirm receipt and inclusion in the First Draft public-comment record.

Sincerely,

Mike Baldwin
President
Kensington Fire Safe Council

Dear Mid-City Communities Plan Update Team,

In addition to Mike Baldwin's comments Monday night at the Kensington Community Church Planning Group meeting, which he has sent to you, I'd like to reiterate the two concerns I raised:

1. **Insurance Crisis:** Like other areas, our residents have had canceled polices and difficulty getting new insurance.
   We've been told by Verisk, which assess risk for many insurance companies, density is a significant rating factor. The more homes packed into an area, the greater the fuel load— the faster a fire jumps from one home to the next. Increasing density in high fire zones therefore doesn't just put more lives and property at risk. It will also drive up insurance costs for all of us and will force even more homeowners into the expensive, low-coverage CA FAIR plan or to go bare.
2. **Water Limitations:** There wasn't enough water available to fight the disastrous 1985 Normal Heights fire which destroyed 76 cherished homes. But that's not ancient history. According to firefighters we spoke with several years ago, during a training exercise in that very same area, there wasn't enough water to support even the exercise. One firefighter told me, "If a major fire occurred that day—we probably couldn't have put it out.
   This should be a giant flashing red light on the plan. If our water system may already be inadequate, and we're facing a future where lawsuits and even wars may be fought over diminishing supplies of water, what happens when a fast-

moving wildfire hits a neighborhood with even more homes—and more people—packed into it?

We should not add density to high-fire-risk areas while ignoring the most fundamental question of all: w**ill firefighters definitely have enough water to save a growing "us"?** That answer can't be dependent on overly optimistic future water supplies, or phantom funding.

I am begging you: protect our residents. Reduce the density goals in <u>all</u> of the high-fire-hazard areas before we create a disaster we cannot undo

Thank you.

Judy Harrington
Co-Chair and Secretary
kensingtonfiresafe.org

June 26, 2026

San Diego Association of Governments (SANDAG)

Chair Heebner & SANDAG Board of Directors
1011 Union Street, Suite 400
San Diego, California 92101

Re: Comments on Draft SB 79 Transit-Oriented Development Stop Map

Dear Chair Heebner and SANDAG Board of Directors:

I. Introduction

The YIMBY Democrats of San Diego County's Law and Policy Team, BuildSD, and Circulate Planning and Policy submit these comments on the San Diego Association of Governments' draft map of Senate Bill 79 (2025) transit-oriented development (TOD) stops and zones, released in June 2026. We thank SANDAG staff for the considerable work required to produce this map under a tight statutory timeline.

Our organization, together with California YIMBY and five co-signatories, submitted a letter to SANDAG on May 29, 2026, identifying five specific concerns with SANDAG's pending map. The draft map substantially resolves three of those five concerns: El Cajon Boulevard, University Avenue, and Park Boulevard south of University Avenue are included as Tier 2 bus service stops, and all NCTD Sprinter stations from Oceanside to Escondido are included as Tier 2 commuter rail stops. We further acknowledge that SANDAG's draft map includes qualifying bus stops beyond those specifically identified in our prior letter, which reflects a good-faith effort to identify eligible stops across the region.

These comments identify remaining deficiencies in three areas: the tier classification of Oceanside Transit Center; the omission of Solana Beach Station; and the omission of qualifying bus stops on corridors that SANDAG has already determined to be eligible, as well as on additional corridors. We address each in turn.

II. SANDAG's Map Must Be Prepared in Accordance with HCD's Guidance

Before addressing the specific deficiencies, we note a foundational legal issue. SANDAG's methodology page states that the draft map "has been prepared in accordance with SB 79, as written." This framing omits a critical statutory requirement.[1]

Government Code section 65912.160, subdivision (f) provides:

> "Each metropolitan planning organization shall create a map of transit-oriented development stops and zones within its region by tier, as designated under this chapter, in accordance with the department's guidance pursuant to subdivision (b)."

The statute thus requires the map to be created in accordance with HCD's guidance, not merely in accordance with the statute's bare text. The California Department of Housing and Community Development (HCD) issued that guidance in the form of its March 20, 2026 advisory to metropolitan

[1]SANDAG, "Draft SB 79 Transit-Oriented Development Stop Map: Methodology and Approach" (June 2026).

MPOs. On the critical question of how to count train frequency at shared stations, HCD stated, for both the 48-train and 72-train thresholds:[2]

> "In assessing whether a station meets this threshold, frequency is based on the total number of trains serving the station, including trains operated by multiple commuter rail services where applicable. This approach reflects the overall level of transit access and frequency experienced by riders at a given stop."[3]

SANDAG's methodology instead applies a single-operator approach, evaluating each commuter rail service independently and concluding that "no commuter rail service reaches the threshold of at least 72 trains per day." This single-operator reading is inconsistent with HCD's guidance and therefore inconsistent with Government Code section 65912.160, subdivision (f). SANDAG co-requested the advisory that establishes this methodology and is bound to apply it.

III. Oceanside Transit Center Must Be Designated Tier 1

Government Code section 65912.156, subdivision (n) defines a Tier 1 TOD stop as one "served by heavy rail transit or very high frequency commuter rail." Section 65912.156, subdivision (r) defines very high-frequency commuter rail as "a commuter rail service with a total of at least 72 trains per day across both directions."

SANDAG correctly classifies NCTD Sprinter service as high-frequency commuter rail and designates all Sprinter stations, including Oceanside Transit Center, as Tier 2 stops. SANDAG's own methodology thereby confirms that the Sprinter operates a total of at least 48 trains per weekday at Oceanside, though in SANDAG's view fewer than 72. However, Oceanside Transit Center is not served only by the Sprinter.

NCTD COASTER service also terminates at Oceanside Transit Center, operating approximately 30 trains per weekday across both directions. Under HCD's multi-operator methodology that SANDAG is required to apply pursuant to section 65912.160, subdivision (f), the combined Sprinter and COASTER service alone yields approximately 98 trains per weekday at Oceanside Transit Center. That figure clears the 72-train very high-frequency threshold without counting any additional operators.

Pacific Surfliner and Metrolink service also stop at Oceanside Transit Center, contributing an additional approximately 32 trains per weekday. HCD's advisory confirms that Pacific Surfliner is commuter rail for SB 79 purposes, noting that "a commuter rail can include...those managed by state-supported Joint Powers Authorities (e.g., Gold Runner, Capitol Corridor, Pacific Surfliner)." The statute's exclusion of "Amtrak Long Distance Service" does not reach Pacific Surfliner, which is a California corridor service. Including all four operators, Oceanside Transit Center receives approximately 130 trains per weekday, nearly double the Tier 1 threshold.[4]

The combined service counts at Oceanside Transit Center are as follows (approximate weekday totals, both directions combined):

NCTD Sprinter: approximately 68 trains per weekday[5]

NCTD COASTER: approximately 30 trains per weekday[6]

Pacific Surfliner: approximately 26 trains per weekday[7]

Metrolink: approximately 6 trains per weekday[8]

Total: approximately 130 trains per weekday

SANDAG must redesignate Oceanside Transit Center as a Tier 1 TOD stop.

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[2]California Department of Housing and Community Development, "Advisory to Metropolitan Planning Organizations re: Senate Bill 79 Implementation Guidance" (Mar. 20, 2026) [hereinafter "HCD Advisory"].
[3]HCD Advisory.
[4]HCD Advisory.
[5]North County Transit District, "Sprinter Weekday Schedule," eff. 2025, https://gonctd.com.
[6]North County Transit District, "COASTER Weekday Schedule," eff. 2025, https://gonctd.com.
[7]Amtrak, "Pacific Surfliner Schedule," eff. 2025, https://www.amtrak.com/pacific-surfliner-train.
[8]Metrolink, "Orange County Line Weekday Schedule," eff. 2025, https://metrolinktrains.com.

IV. Solana Beach Station Must Be Added as Tier 2

Solana Beach Station does not appear in SANDAG's draft map. Government Code section 65912.156, subdivision (e) defines high-frequency commuter rail as "a commuter rail service operating a total of at least 48 trains per day across both directions." Under HCD's multi-operator methodology, Solana Beach Station qualifies:

NCTD COASTER: approximately 30 trains per weekday

Pacific Surfliner: approximately 26 trains per weekday

Total: approximately 56 trains per weekday

56 trains per weekday exceeds the 48-train high-frequency commuter rail threshold. Solana Beach Station must be added to the map as a Tier 2 TOD stop.

V. Missing Qualifying Bus Stops: Internal Inconsistency and Additional Corridors

We commend SANDAG's inclusion of qualifying bus stops on El Cajon Boulevard, University Avenue, and Park Boulevard (the three corridors identified in our prior letter), as well as stops on additional corridors including Broadway, 4th Avenue, 11th Avenue, and Gilman Drive, which we had not specifically requested. This demonstrates that SANDAG correctly identified those corridors as having qualifying dedicated bus lanes with peak service intervals of 15 minutes or less.

Government Code section 65912.156, subdivision (o) defines a Tier 2 TOD stop as one served by "bus service meeting the standards of paragraph (1) of subdivision (a) of Section 21060.2 of the Public Resources Code." That provision specifies the statutory bus qualification standard: "[f]ull-time dedicated bus lanes or operation in a separate right-of-way dedicated for public transportation with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." SANDAG's existing designations on El Cajon Boulevard, University Avenue, Park Boulevard, and at the Gilman Drive and downtown San Diego stop-level locations confirm that bus-only and bus/bike pavement markings constitute "full-time dedicated bus lanes" within the meaning of that standard.

California's Vehicle Code provides additional statutory support for this conclusion. Vehicle Code section 40240 defines a "transit-only traffic lane" as "any designated transit-only lane on which use is restricted to mass transit vehicles, or other designated vehicles including taxis and vanpools, during posted times." Vehicle Code section 21655.1, subdivision (a), as amended by AB 971 (Chapter 672, Statutes of 2023), prohibits any person from operating a motor vehicle on a portion of a highway designated as a transit-only traffic lane. The bus-only and bus/bike pavement markings at the stops identified in this section are transit-only traffic lanes under this definition: they are permanent designations restricting general motor vehicle use to transit vehicles, with no posted time restrictions, making them "full-time dedicated bus lanes" within the meaning of Public Resources Code section 21060.2, subdivision (a)(1). Moreover, under Vehicle Code section 525, "right-of-way" is defined as "the privilege of the immediate use of the highway." In a designated transit-only traffic lane, transit vehicles hold the exclusive privilege of immediate use of that lane segment by statutory command, satisfying the alternative prong of Public Resources Code section 21060.2, subdivision (a)(1) as well: operation in "a separate right-of-way dedicated for public transportation."[9]

The relevant peak headways on the corridors SANDAG has recognized, per MTS published schedules, are as follows: MTS Route 1 operates at 15-minute peak headways on El Cajon Boulevard on weekdays in both directions, which is the minimum qualifying frequency under the statute. MTS Route 7 operates at approximately 12-minute peak headways on University Avenue and Park Boulevard on weekdays in both directions. MTS Route 10, which provides limited-stop overlay service on University Avenue, operates at approximately 12 to 15-minute peak headways and supplements Route 7 service throughout the corridor. All three routes operate within designated dedicated transit-only traffic lanes on the corridors at issue.[10]

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[9]Cal. Veh. Code § 40240; id. § 21655.1 (as amended by AB 971, Ch. 672, Stats. 2023); id. § 525.

[10]San Diego Metropolitan Transit System, "Route 1 Weekday Schedule"; "Route 7 Weekday Schedule"; "Route 10 Weekday Schedule," each eff. 2025, https://www.sdmts.com.

However, SANDAG's map omits stops on those same approved corridors that share identical qualifying characteristics as the stops SANDAG did include: the same dedicated lane designation and the same qualifying bus route at the same qualifying frequency. On El Cajon Boulevard, SANDAG included stops served by Route 1 in the dedicated lane at Arizona Street and Utah Street, but omitted other stops on that same corridor at the same 15-minute peak frequency, including stops at Park Boulevard, Alabama Street, Louisiana Street, Illinois Street, 35th Street, 36th Street, 37th Street, and Copeland Avenue, among others. On University Avenue, SANDAG included Route 7 and Route 10 stops at 30th Street and Herman Avenue but omitted stops served by Route 7 at the same 12-minute peak frequency in the same lane, including stops at Grim Avenue, Bancroft Street, Idaho Street, and Arizona Street. On Park Boulevard, SANDAG included stops where Rapid Route 215 is also present but omitted stops served by Route 7 alone, including Zoo Place, Village Place, and Presidents Way, despite Route 7's 12-minute peak headways in the same dedicated lane used by the included stops. A representative but non-exhaustive set of omitted stops on each SANDAG-recognized corridor is set forth in Appendix A to this letter.

If SANDAG determined that stops served by Route 1 at 15-minute peak headways in a dedicated lane qualify on El Cajon Boulevard, then all stops on that corridor meeting the same criteria must qualify. The same logic applies to Route 7 stops on University Avenue and Park Boulevard. There is no principled basis under the statute or HCD's guidance to include some stops on a qualifying corridor while excluding others with identical service characteristics. The stops enumerated in Appendix A are representative rather than exhaustive; SANDAG must undertake a complete review of each qualifying corridor to identify all omitted stops.

SANDAG's draft map further demonstrates that a qualifying bus stop need not be located along a continuous dedicated lane corridor. The stops SANDAG recognized beyond our prior letter, including those at Broadway and 3rd Avenue, 4th Avenue and Broadway, 4th Avenue and E Street, and two stops at 11th Avenue and C Street in downtown San Diego, as well as at Gilman Drive and Mandeville Lane near the UCSD campus, each have dedicated lane markings at or immediately adjacent to the stop itself: pavement markings or signage reading "BUS ONLY," "BIKE BUS ONLY," or equivalent. The marking exists at the stop; it does not require a continuous dedicated lane of any minimum length. Each of these stops is served by a qualifying route at peak headways of 15 minutes or less.

Several additional stops throughout the county share that stop-level dedicated lane configuration and must be added to the map. Stops on Genesee Avenue are served by MTS Route 41, which is the same route SANDAG recognized at Gilman Drive and Mandeville Lane, operating at 15-minute peak headways in the same dedicated lane configuration. Stops on Clairemont Mesa Boulevard and Convoy Street are served by MTS Routes 43 and 44, each operating at peak headways of 15 minutes or less on weekdays, as confirmed by published MTS timetables. The peak weekday headways for each route on its dedicated lane corridor are as follows:[11]

MTS Route 41: 15-minute peak headways on Genesee Avenue

MTS Route 43: 15-minute peak headways on Clairemont Mesa Boulevard

MTS Route 44: 15-minute peak headways on Clairemont Mesa Boulevard and Convoy Street

SANDAG has established by its own designations that stop-level dedicated bus lane markings served by qualifying routes at qualifying frequencies are sufficient for Tier 2 designation. There is no principled basis for excluding the following identified stops, which share that same configuration and are representative rather than exhaustive, are set forth in Appendix A.

The stop-level dedicated lane standard established by SANDAG's own designations also encompasses additional stops elsewhere in the county. On Pacific Highway and on University Avenue at Vermont Street, stops served by MTS Route 10 have dedicated lane markings at the stop. On Park Boulevard at Howard Avenue, a stop served by MTS Route 1 has a dedicated lane marking. On Balboa Avenue at Moraga Road, a stop served by MTS Route 43 has a dedicated lane marking. In the City of La Mesa, a stop on Allison Avenue at Date Street served by MTS Route 1 has a dedicated lane marking. Routes 1, 10, and 43 operate at qualifying peak headways as established above. In the City

[11]San Diego Metropolitan Transit System, "Route 41 Weekday Schedule" (eff. Jan. 25, 2026); "Route 43 Weekday Schedule" (eff. June 30, 2023); "Route 44 Weekday Schedule" (eff. Jan. 25, 2026), https://www.sdmts.com.

of Chula Vista, a stop on East Palomar Street at Nacion Avenue is served by MTS Route 712, which operates at peak headways of 15 minutes or less in both directions, as confirmed by the published MTS timetable effective June 30, 2023.[12]

The stops in this category are set forth in Appendix A and must be added to the map.

Two stops at University Avenue and 58th Street are located on a Bus Only lane that is actively under construction. MTS Route 7 already serves this segment at 12-minute peak headways and will operate in the completed dedicated lane upon construction. The dedicated bus lane is a component of the University Bikeway (RTIP Project SAN227), a $44.6 million project funded with federal, state, and local funds that broke ground in March 2026 and is expected to open in September 2027. Government Code section 65912.156, subdivision (p) defines 'transit-oriented development stop' to include stops 'identified in a regional transportation improvement program'—a category these stops satisfy, as SANDAG's 2023 RTIP expressly includes new bus boarding platforms at this location served by Route 7 at qualifying frequencies. Excluding these stops from the SB 79 map would also frustrate the statute's prospective land use planning purpose: SB 79 is designed to align development decisions with committed transit investments, not merely with infrastructure that was fully complete on the day the map was drafted. These stops are identified in Appendix A and must be included in the final map.[13]

VI. Requested Actions

The following corrective actions are required by statute and HCD guidance. SANDAG must complete each no later than July 1, 2026:

1. Apply HCD's multi-operator aggregation methodology to all commuter rail station frequency counts, consistent with the March 20, 2026 HCD advisory and the requirements of Government Code section 65912.160, subdivision (f).
2. Redesignate Oceanside Transit Center as a Tier 1 TOD stop, reflecting the approximately 130 combined commuter rail trains per weekday serving that station.
3. Add Solana Beach Station to the map as a Tier 2 TOD stop, reflecting the approximately 56 combined commuter rail trains per weekday serving that station.
4. Add all qualifying bus stops on El Cajon Boulevard, University Avenue, and Park Boulevard that were omitted from the draft map despite sharing the same dedicated lane designation and qualifying peak service frequency as the stops SANDAG included on those corridors, including stops on the Bus Only lane under construction at University Avenue and 58th Street, as enumerated in Appendix A.
5. Add all qualifying bus stops that have stop-level dedicated bus lane markings and are served by qualifying routes at peak headways of 15 minutes or less, consistent with the standard SANDAG applied to the Gilman Drive and downtown San Diego stops already in the draft map, including stops on Genesee Avenue (Route 41), Clairemont Mesa Boulevard (Routes 43 and 44), Convoy Street (Route 44), Pacific Highway (Route 10), University Avenue at Vermont Street (Route 10), Park Boulevard at Howard Avenue (Route 1), Balboa Avenue at Moraga Road (Route 43), Allison Avenue in the City of La Mesa (Route 1), and East Palomar Street in the City of Chula Vista (Route 712), among others, as enumerated in Appendix A.
6. Publish the revised final map no later than July 1, 2026.

We are available to discuss any of the above concerns with SANDAG staff.

Respectfully submitted,

---

[12]San Diego Metropolitan Transit System, "Route 712 Weekday Schedule" (eff. June 30, 2023), https://www.sdmts.com.
[13]SANDAG, 2023 Regional Transportation Improvement Program, Project SAN227 (North Park/Mid-City Bikeways—University Bikeway); SANDAG, "SANDAG Breaks Ground on University Bikeway in the City of San Diego" (Mar. 11, 2026), https://www.sandag.org.



Zack Defazio-Farrell
Treasurer and Law & Policy Team Member
YIMBY Democrats of San Diego County



Maxwell Gergen
Board Member
BuildSD



Aria Grossman
Policy Manager
Circulate Planning and Policy

Appendix A: Identified Unrecognized SB 79 Tier 2 Bus Stops

YIMBY Democrats of San Diego County — SANDAG Draft SB 79 Tier 2 TOD Stop Map

EB = eastbound | WB = westbound | NB = northbound | SB = southbound | This list is representative and not exhaustive.

A. Stops Omitted from SANDAG-Recognized Corridors

Stop Name	Stop ID	Corridor / Location	Route(s)
El Cajon Blvd EB at Park Blvd	10502	El Cajon Blvd	Route 1
El Cajon Blvd EB at Alabama St	10129	El Cajon Blvd	Route 1
El Cajon Blvd EB at Louisiana St	10517	El Cajon Blvd	Route 1
El Cajon Blvd EB at Illinois St	10548	El Cajon Blvd	Route 1
El Cajon Blvd EB at 35th St	10196	El Cajon Blvd	Route 1
El Cajon Blvd EB at 36th St	10201	El Cajon Blvd	Route 1
El Cajon Blvd EB at 37th St	10204	El Cajon Blvd	Route 1
El Cajon Blvd EB at Copeland Ave	13531	El Cajon Blvd	Route 1
El Cajon Blvd WB at Illinois St	11303	El Cajon Blvd	Route 1
El Cajon Blvd WB at 33rd St	10942	El Cajon Blvd	Route 1
El Cajon Blvd WB at 35th St	11329	El Cajon Blvd	Route 1
El Cajon Blvd WB at 36th St	11333	El Cajon Blvd	Route 1
El Cajon Blvd WB at 37th St	10960	El Cajon Blvd	Route 1
El Cajon Blvd WB at 38th St	11344	El Cajon Blvd	Route 1
El Cajon Blvd WB at Copeland Ave	11355	El Cajon Blvd	Route 1
University Ave EB at Grim Ave	10547	University Ave	Route 7
University Ave WB at Bancroft St	11315	University Ave	Route 7
University Ave WB at Idaho St	10909	University Ave	Route 7
University Ave WB at Arizona St	10899	University Ave	Route 7
Park Blvd SB at Zoo Place	11666	Park Blvd	Route 7
Park Blvd SB at Village Place	12067	Park Blvd	Route 7
Park Blvd SB at Presidents Way	12060	Park Blvd	Route 7
Park Blvd NB at Presidents Way	12793	Park Blvd	Route 7
Park Blvd NB at Village Place	12457	Park Blvd	Route 7

B. Additional Stops with Stop-Level Dedicated Lane Markings

Stop Name	Stop ID	Corridor / Location	Route(s)
Genesee Ave & Osler St NB	13175	Genesee Ave	Route 41
Genesee Ave & Osler St SB	12403	Genesee Ave	Route 41
Gilman Dr & Myers Dr	10374	Gilman Dr	Routes 30, 202
Gilman Dr & Villa La Jolla Dr	10775	Gilman Dr	Routes 41, 921
Clairemont Mesa Blvd & Shawline St EB	10466	Clairemont Mesa Blvd	Route 43
Clairemont Mesa Blvd & Shawline St WB	10091	Clairemont Mesa Blvd	Route 43
Clairemont Mesa Blvd & Mercury St EB	10495	Clairemont Mesa Blvd	Routes 43, 44
Clairemont Mesa Blvd & Mercury St WB	11260	Clairemont Mesa Blvd	Routes 43, 44
Clairemont Mesa Blvd & Ruffner St EB	10477	Clairemont Mesa Blvd	Route 43
Clairemont Mesa Blvd & Ruffner St WB	11247	Clairemont Mesa Blvd	Route 43
Clairemont Mesa Blvd & Industrial Park WB	13103	Clairemont Mesa Blvd	Routes 43, 44
Clairemont Mesa Blvd & Convoy St WB	10486	Clairemont Mesa Blvd	Routes 43, 44
Convoy St & Clairemont Mesa Blvd SB	12059	Convoy St	Route 44

Appendix A: Identified Unrecognized SB 79 Tier 2 Bus Stops

YIMBY Democrats of San Diego County — SANDAG Draft SB 79 Tier 2 TOD Stop Map

EB = eastbound | WB = westbound | NB = northbound | SB = southbound | This list is representative and not exhaustive.

Convoy St & Armour St NB	99069	Convoy St	Route 44
Convoy St & Armour St SB	99045	Convoy St	Route 44
Convoy St & Othello Ave SB	99227	Convoy St	Route 44
Convoy St & Ronson St	12791	Convoy St	Route 44
Convoy St & Engineer St NB	11660	Convoy St	Route 44
Convoy St & Engineer St SB	12788	Convoy St	Route 44
Convoy St & Daggett St	99354	Convoy St	Route 44
Convoy St & Balboa Ave	12785	Convoy St	Route 44
Pacific Hwy & Witherby St SB	12366	Pacific Hwy	Route 10
Pacific Hwy & Witherby St NB	11957	Pacific Hwy	Route 10
Pacific Hwy & Washington St	12377	Pacific Hwy	Route 10
Washington St & Pacific Hwy	13351	Pacific Hwy	Route 10
University Ave & Vermont St	11254	University Ave	Route 10
Park Blvd & Howard Ave	11671	Park Blvd	Route 1
Balboa Ave & Moraga Rd	10045	Balboa Ave	Route 43
Allison Ave & Date St	13410	Allison Ave (La Mesa)	Route 1
E Palomar St EB at Nacion Ave	99064	E Palomar St (Chula Vista)	Route 712

C. Stops on Under-Construction Dedicated Bus Lane (University Ave & 58th St)

Stop Name	Stop ID	Corridor / Location	Route(s)
University Ave & 58th St (NB)	11403	University Ave	Route 7
University Ave & 58th St (SB)	10661	University Ave	Route 7

Dear City Planners,

I oppose the City's Mid-City Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan. This Alternative Plan addresses and resolves my key concerns that the city plan omits, such as focusing new density on and near transit and commercial corridors, rather than deep within established neighborhoods such as mine.

Please record my opposition to the City's Draft Plan and register my support for the KTPG Alternative Plan.

Respectfully,

Leslie S Zoref

Leslie S Zoref

Talmadge

September 27, 2026

To: City of San Diego City Planning Department
Mid-City Communities Plan Update Team

CC: Mayor Todd Gloria; Council President Joe LaCava; Council President Pro Tem Kent Lee; Councilmembers Jennifer Campbell, Stephen Whitburn, Henry Foster III, Marni von Wilpert, Raul Campillo, Vivian Moreno and Sean Elo-Rivera

Re: Draft Mid-City Communities Plan — Comments for Normal Heights

Dear City Planning Team:

Thank you for the opportunity to comment on the Draft Mid-City Communities Plan. I am writing specifically from the perspective of Normal Heights.

I support the central idea that our neighborhood in Normal Heights should evolve. We need safer streets, more trees, more public spaces and more opportunities for people to live close to schools and the places they work, shop, and gather.

But I believe the measure of this plan should be larger than how many additional housing units it makes possible. My highest priorities are to make Normal Heights dramatically more walkable and shaded while ensuring that the people who already live here can stay and enjoy those improvements. As the City considers the future of Normal Heights, I ask the City to carry four priorities into the next draft:

1. Make resident stability a measure of success.

Growth and density in Normal Heights should create room for new neighbors without unnecessarily displacing the people who already live in Normal Heights.

A healthy community plan should be capable of making room for both existing residents and future residents, so they all belong without the fear of displacement. As new housing is added, the city should also have a clear strategy for preserving existing housing and be monitoring displacement, renter stability, and a plan for housing preservation.

2. Treat Adams Avenue as the social heart of Normal Heights.

Adams Avenue works because people hang out and encounter one another there. It is the backbone of our community. The place where people go to the grocery store, restaurants, yoga studios, the post office, cafes and hair salons.

Most of the businesses along Adams Avenue are locally owned businesses and create repeated opportunities for people to see one another, do business, and develop relationships. These

seemingly ordinary encounters are part of the infrastructure of a thriving community like Normal Heights.

As Adams Avenue grows, new development should strengthen the quality of life that already exists through active ground floors, smaller storefronts, inviting sidewalks, pocket parks, outdoor seating, trees and places where people can sit, hang out and be together.

More housing and density along Adams Avenue should result in more neighborhood life**,** and connection.

3. Connect growth to visible improvements in everyday life.

Growth is easier for a community to embrace when people can see and experience how it contributes to a better neighborhood. More density should bring more trees, more public spaces, and traffic calming measures along Adams Avenue and surrounding areas. Is there a way we can communicate this better in the plan? I also support the addition of a modern library in our neighborhood that the residents and schools can use.

4. Make walkability and shade essential infrastructure.

Normal Heights is already a walkable and densely populated community. As it grows, walking should become safer, easier and more pleasant.

That means traffic calming, wider sidewalks, and comfortable connections among homes, Adams Avenue, schools, parks and community facilities. It also means taking shade seriously. Shade affects whether someone chooses to walk to the store, wait for a bus, walk a child to school or spend time outside.

The City should establish measurable tree-canopy and shade goals, with the long-term aspiration of making Adams Avenue a nearly continuous shaded pedestrian corridor.

I think thirty years from now, the measure of this plan should be whether people of different incomes can still live in Normal Heights, participate in neighborhood life, encounter one another, feel that they belong, and whether the things that make Normal Heights such a wonderful community, continue to grow stronger, healthier, and better with the change.

If we can accomplish that, we will help create the conditions in which the community of Normal Heights can continue to flourish.

Thank you for your consideration and for your care in planning the future of Normal Heights.

Sincerely,

Madeleine Baudoin
Normal Heights Resident
San Diego, California

Chris Reed

Deputy Editor

SD Union Tribune

Oct. 19, 2026

Re: Mid-City Plan Update

The proposed plan calls for higher density in single family neighborhoods. It concentrates on the two primary commercial corridors and in the case of City Heights continues the density apron 2-4 blocks South of University and down Euclid and Fairmount with major high density along the SR-15 Freeway.

This proposed stepping back density from commercial corridors threatens to continue the displacement of current City Heights residents initiated by Caltrans along the 40th street (SR-15) corridor of about 1500 residents. This displacement was continued by the City Heights Village project, displacing about another 1500 residents. In both cases affordable single-family homes were condemned and residents displaced. Locally owned businesses and two full-service grocery stores were demolished. The third grocery store (Vons) was turned into a police station. Subsequent development of nearly 1200 low-income apartments, all within a one square mile has displaced additional homes and businesses creating a glass and stucco street corridor. Increasing this trend with dense zoning perpetuates income and racial ghettos with inadequate access to even buy food.

The proposed zoning violates the city, county and state clean air goals. The single-family neighborhoods of Mid-City are a green belt absorbing the toxic fumes of Mission Valley and downtown as well as the matrix of freeways dividing the communities. Trees and green yards absorb Co2 to create breathable air for Mid-City residents. Removing those trees with high density cement and asphalt roof tops creates an unbroken plateau of toxicity throughout the central city. The existing green belt of single-family homes with yards should be protected as a regional clean air asset. Balboa Park isn't enough.

Research we did, while I was an Adjunct Professor at UCSD Urban Studies with Dr Mirle Bussell, assessed the informal economy of City Heights. Among other things it found that the informal economy is the largest employer in the area. In addition, it found that the dominant product of the informal economy is "food". City Height's houses many new immigrants who come from countries with major informal economies and from rural areas. People grow food in back yards in City Heights. Destruction of single-family homes leaves residents standing in long lines every day at a single, overcrowded, limited grocery store without the option of exchanging, buying,

selling, food, homegrown products, to their neighbors. You can't grow food in an apartment. These gardens provide a subsistence food chain in an increasingly inaccessible marketplace.

The single-family home in City Heights and other Mid-City neighborhoods is an economic incubator. Ownership of these homes, many affordable, has evolved They have been a fundamental factor in the absorption of multiple cultures. As a City Heights resident of fifty years and the founder of the City Heights Community Development Corporation, this absorption process has been observed and encouraged. People come, kids grow up, they sell and move up with the equity these homes provide each new generation. Ethnicities change, expand, contract all the while providing economic opportunity for each new generation. There's a reason new immigrants settle in City Heights. It's affordable, and dialogue with new unfamiliar ethnicities occurs in an accepting, manageable environment: back yards.

The down zoning we did in the past was not motivated by racist goals. It was motivated by the fact that our (my)children were taking classes in overcrowded classrooms, in hallways, outside. In addition, the zoning between University and El Cajon, from 54th to the 805 freeway, if built out, would accommodate the population of Manhattan. There were almost no parks either. That's why we sought three new parks along the new SR-15 freeway. That's why we also fought for new schools and got some.

University Avenue is also dominated by locally owned small business owners with long term leases or in some cases owned property. New development escalates rents and will displace these and have with City Heights Village for example. These businesses are a fundamental economic engine in these communities. Their dislocation will cause economic hardship especially for migrant families. Ethnic serving small businesses maintains the economic viability of this linear commercial strip. Before them there were vacant storefronts.

The proposed plan calls for the possible new trolley line to go up the 805. The residents of City Heights argued that the proposed SR-15 freeway violated "neighborhood cohesion". They fought to cover it between two schools and asked for two parks, one at each end. After it was built, for 15 years they advocated for the Centerline, a bus HOV lane and well-designed loading platforms. They accessed $32M from Sandag to build them. They are built to accommodate the proposed new trolley and transport City Heights residents to work North and South. Do not put it up the 805. Let City Heights resident s work.

Finally, there is a need to establish a historic district on University Ave between 42nd and 43rd Street. It is the site of the former East San Diego City Hall, a unique and historical theatre, the post office (market) and the former B of A now the Black Cat bar. It also houses the first offices of the CHCDC (1977) above the Brown Jug Liquor store.

Densification in Mid City neighborhoods is an outdated, trite, casual urban design strategy that

evolves from external priorities. Mid-City communities hold historic, ecological, economic and cultural treasures that should not be erased from City Hall cubicles. Look at Mid-City in its overall citywide context. Not every place needs to be high density. High density needs to breathe and have places with character to walk, visit, attend, learn. Single family neighborhoods of Mid-City provide that. Its web of canyons, enhanced by backyard green, are the city's lungs and need to be preserved and enhanced.

Sources;

"The Death and Life of Great American Cities", Jane Jacobs

"City Form and Natural Process", Michael Hough

"Urban Ecological Design", Danilo Palazzo and Frederick Steiner

"The Informal Economy in City Heights", Jim Bliesner, MA, Mirle Bussell, PHD

"Walkability Index Strategy- City Heights", Center for Urban Economics and Design. UCSD

Respectfully submitted,

Jim Bliesner

Former Director City/County Reinvestment Task Force

Former Adjunct Professor, Urban Studies, UCSD

Founder City Heights Community Development Corp.

Mid-City Communities Fair Housing Review

Fair housing conditions and the first draft plan update

Prepared by San Diego Fair Housing Lab
Date September 2026
Mid-City Communities Plan Update, September 2026

Contents

0. Front Matter 3
1. The Mid-City Plan Update: Where Things Stand 4
2. What the Data Shows: Four Communities, Three Distinct Stories 6
3. The Fair Housing Geography of Mid-City 11
4. What the Plan Commits To, and Where the Evidence Falls Short 14
5. Four Fair Housing Tests for the Draft Plan 16
6. Environmental Justice and Housing 20
7. Engagement and Accountability 21
8. What We Ask the City to Change or Demonstrate 22
9. Specific Questions for the Second Draft 24
10. Conclusion: A Stronger Fair Housing Plan Is Still a Housing Plan 25
Terms used in this document 26

0. Front Matter

> **About this document.** This review is Part I of a two-part work. Part II, the supporting technical documentation, carries the detailed data record, methodology, the City's fair housing record, community profiles and sourcing. **Chapter references above 10 point to Part II**, which the San Diego Fair Housing Lab will publish on its website. Every figure in this review is either reproduced from one of the Lab's four community reports or verified directly against tract-level Census and State data.

What this document is. A tract-level fair housing review of the first draft Mid-City Communities Plan Update, covering all four communities inside the plan boundary: Mid-City City Heights, Mid-City Eastern Area, Mid-City Kensington-Talmadge and Mid-City Normal Heights. It combines this organization's analytical record with its formal public comment, which was previously a separate document and is now consolidated here.

Companion analysis. A separate corridor analysis examines traffic exposure, transit demand and residential intensity across the corridors the plan designates. It is kept separate so the transportation argument does not eclipse the fair housing one. Chapter 6 summarises its findings and its asks.

Sources. U.S. Census Bureau data, California HCD's 2026 Opportunity Map and Neighborhood Change methodology, HCD Annual Progress Report housing production data, CalEnviroScreen 5.0, and the City of San Diego's own plan documents and Housing Element Fair Housing Appendix. Plan figures and quotations are the City's own. Full sourcing in Chapter 19.

The four community reports function as this document's appendices, and carry the full per-tract record behind every aggregate cited here:

- **Appendix 1** – City Heights community report, 15 tracts.
- **Appendix 2** – Eastern Area community report, 7 tracts, including the central detection-gap finding.
- **Appendix 3** – Kensington-Talmadge community report, 4 tracts, including the plan area's only Persistent RCAA tract.
- **Appendix 4** – Normal Heights community report, 4 tracts, including its Black non-Hispanic population decline and its complete pathway designation coverage.

A note on terms. Where this document says **neighborhood change area**, it means a tract carrying one of California HCD's Neighborhood Change pathway designations: the State's own marker for a historically lower-income community of color that has since seen substantial racial and economic change. Where it says **lowest opportunity tier**, it means Low Resource on HCD and TCAC's 2026 Opportunity Map. Both are the State's classifications, not this organization's.

A note on housing figures. Capacity is what a plan's land use map would allow to be built. **Permitted** units have been authorised. **Completed** units exist. This document reports production as permitted or as completed, never as a rate computed between them, and it does not treat capacity as a forecast of production. Three of the four communities here added units while losing population, and the plan area permits at roughly half the citywide rate, seven in ten of those permits being accessory units. **Where this review asks the City to publish capacity by community, it is asking what the plan assumes, not what the market will deliver.**

1. The Mid-City Plan Update: Where Things Stand

1.1 A plan adopted before the law that now governs it

The Mid-City Communities Plan currently in effect was adopted **4 August 1998**, covering all four communities examined here. AB 686 (2018, effective 2019), the Baker Settlement (March 2025), and HCD's Neighborhood Change and Opportunity Map methodologies (2026) all postdate it by between 21 and 28 years.

The plan being replaced was adopted before California law required any of the analysis in this review. That is the opportunity this update represents, and it is why the fair housing content of the first draft matters more here than in an ordinary plan amendment.

1.2 This update is unlike the twelve that came before it

Since 2016 the City has comprehensively updated twelve community plans: Greater Golden Hill, North Park, San Ysidro and Uptown in 2016; Midway-Pacific Highway in 2018; Mission Valley in 2019; Kearny Mesa in 2020; Barrio Logan in 2021; Mira Mesa in 2022; University in 2024; and Clairemont Mesa and College Area in 2025.

Measured on the two instruments the State itself uses, Mid-City is close to the inverse of that entire set.

TABLE 1.1 – MID-CITY AGAINST EVERY COMMUNITY PLAN COMPREHENSIVELY UPDATED SINCE 2016

	Tracts	Highest or High Resource	Lowest opportunity tier	Neighborhood change areas
Twelve communities updated 2016 to 2025	96	**63**	14	14 (14.6%)
City of San Diego	311	170	95	44 (14.1%)
Mid-City, this draft	**30**	**1**	**23**	**9 (30.0%)**

Verified by direct query against the State's 2026 Opportunity Map and Neighborhood Change classifications, joined to 2020-vintage census tract geography across all 311 in-city tracts.

Mid-City's neighborhood change rate is roughly double both the citywide rate and the combined rate of every community the City has comprehensively updated in the last decade. Nine of those twelve communities contain no neighborhood change area at all. The four most recent updates before this one, covering **51 census tracts** in Mira Mesa, University, Clairemont Mesa and College Area, contain **zero**.

The fair housing component of this plan therefore carries weight that recent precedents did not. A fair housing analysis that was arguably a formality in Mira Mesa is the substance of the matter here.

1.3 The land-use alternative carried into the first draft

This review does not evaluate the plan's land use alternatives. That assessment requires reading the City's own alternatives documentation directly, which is outside the scope of this review as published. The companion corridor analysis examines the residential intensity pattern the selected alternative produces, and Chapter 6 summarises it.

1.4 What the plan says it is trying to accomplish

The City has described the update publicly as creating capacity for on the order of **30,000 new homes over 30 years**.

That figure is the City's, and this review does not adopt it as a premise. The draft does not publish residential capacity by community planning area, which means the 30,000 cannot be tested against the distribution question this review asks. **The absence is the point, and it is the subject of the ask at 8.2.** Where alternative capacity figures appear in the City's own materials, this review cites them as alternatives rather than resolving between them.

The draft itself carries a plan-area figure. Table 2-1, Development Potential, at printed page 15 (captioned Table 2-2 on the page; the draft's own numbering is inconsistent), puts residential development potential at **53,500 homes in 2025, a possible net future change of 42,000, and a horizon total of 95,500**, with population rising from 138,000 to 227,000. The City's project page and press coverage describe the update as capacity for about 30,000 homes. Both are City figures; no City document reconciles them, and the likely relationship, net new homes above the existing stock against total buildout, is not stated anywhere this review has found. **The draft therefore publishes a plan-area total and no split among the four communities.** Anyone quoting a Mid-City capacity figure should say which one and cite its page.

The draft also invokes the City's duty to affirmatively further fair housing, states that it will reverse patterns of segregation and reduce concentrations of poverty, and in **Policy 2.8** encourages the equitable distribution of affordable housing.

1.5 The fair housing question this review tests

Not whether the plan builds enough housing, and not whether it builds too much. This review asks a narrower and more answerable question:

> **Does the plan test where its housing capacity, its affordability requirements and its environmental burden land, against the fair housing geography the City has already adopted?**

That question can be answered from the document itself, and the answer is developed in Chapter 4.

2. What the Data Shows: Four Communities, Three Distinct Stories

2.1 Four communities, one planning boundary

The four Mid-City communities share a boundary and not a fair housing story. Population change alone runs from Eastern Area's +15.4 percent to City Heights' -8.0 percent, opposite directions inside a single plan boundary.

TABLE 2.1 – MASTER COMPARISON

	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	District 9	City of San Diego
Tracts	15	7	4	4	33	311
Population change	-8.0%	+15.4%	+2.9%	-4.4%	-1.7%	+14.1%
Unit growth	+6.3%	+9.9%	+11.3%	+7.0%	+8.0%	+21.7%
Growth gap (units - pop, pp)	+14.3	-5.5	+8.4	+11.4	+9.7	+7.7
Current crowding rate	15.7%	7.7%	2.3%	2.8%	10.0%	5.8%
Rent change vs. 64.5% threshold	73.7% (ABOVE)	61.8% (below)	65.2% (ABOVE)	83.1% (ABOVE)	70.1% (ABOVE)	64.8% (ABOVE)
Opportunity tier composition	15 Low	7 Low	**3 Moderate / 1 Low**	**1 High / 3 Moderate**	1 Highest / 1 High / 7 Moderate / 24 Low	117 Highest / 53 High / 45 Moderate / 95 Low / 1 unclassified
Mean opportunity score (0-9)	1	1	**3**	**5**	2	5
Neighborhood change rate	26.7% (4 of 15)	0.0% (0 of 7)	25.0% (1 of 4)	100.0% (4 of 4)	36.4% (12 of 33)	14.1% (44 of 311)
RCAA-concentrated tracts	0	0	**1**	0	1	26
CES 5.0 overall percentile	74.0	62.8	32.0	18.1	58.3	37.1

Every cell is traced to the community report's own sections. The RCAA row counts RCAA-concentrated tracts only; see 2.4 and Chapter 13. Growth gaps are computed from unrounded growth rates and can differ by 0.1 point from the difference of the two printed rates.

TABLE 2.2 – AGE COMPOSITION, 2000 TO CURRENT

	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	District 9	City of San Diego
Under-18 share	36.6% → 23.0%	25.6% → 21.8%	20.2% → 15.3%	22.2% → 10.4%	30.0% → 19.7%	24.4% → 18.8%
Under-18 change (pp)	-13.6	-3.8	-4.9	-11.8	-10.3	-5.6
Under-18 change (count)	**-12,878**	-128	-613	**-1,731**	–	-35,591
65+ share	5.3% → 10.6%	11.6% → 12.7%	11.0% → 15.1%	6.9% → 10.2%	7.2% → 10.6%	10.6% → 14.9%
65+ change (pp)	+5.2	+1.2	+4.1	+3.3	+3.4	+4.3

Share figures from each community report's own Section 7. Count figures are from direct query of Census age-bracket counts; they reconcile to the share figures through each community's population change. Point changes are computed from unrounded shares and can differ by 0.1 from the difference of the two printed shares.

2.2 City Heights: population loss, crowding and environmental burden

Verified figures. 15 tracts. Population **-8.0 percent** (83,084 to 76,398) against District 9's -1.7 percent and a citywide +14.1 percent. Current crowding **15.7 percent**, the highest of the four and more than double the citywide 5.8. CES 5.0 percentile **74.0**, the highest of the four. Neighborhood change rate **26.7 percent (4 of 15)**, below District 9's own 36.4 percent. **All 15 tracts in the lowest opportunity tier.** Zero RCAA-concentrated tracts.

City Heights holds roughly half the plan area's population and its largest concentration of need. Its crowding rate is the figure that most distinguishes it: more than double the citywide rate, alongside continued population loss and the plan area's highest environmental burden. **It lost 12,878 children since 2000, the largest absolute loss of any community planning area in the city.**

Its housing units grew 6.3 percent while its population fell 8.0 percent. Those two figures reconcile through household size and, to a smaller degree, through vacancy. **Occupied units rose 4.1 percent** over the same period, from about 24,600 to about 25,600, while **average household size fell from 3.363 to 2.957**, a decline of 12.1 percent. The vacancy rate rose from 3.7 to 5.6 percent, and holding the 2000 occupancy rate against the current stock puts about 530 units behind that rise, **just under a quarter of the population decline.** Household size carries the rest.

City Heights gained households and lost people. What that does not establish is why household size fell. Smaller households forming, larger households leaving, and turnover replacing larger households with smaller ones all produce this pattern, and the data here do not separate them.

What this data does not establish is why the State's own instrument flags this community less often than the district around it. Chapter 12 returns to that directly.

2.3 Eastern Area: growth accompanied by compositional change the State does not detect

Verified figures. 7 tracts. Population **+15.4 percent** (32,092 to 37,049), close to the citywide rate, and the only Mid-City community where population growth outpaced housing growth. White non-Hispanic population **-26.0 percent** (12,562 to 9,292); population of color **+42.1 percent** (19,530 to 27,757), both

reproduced from the tract counts at three geographic scales. **Zero of 7 tracts carry any neighborhood change designation.** All 7 tracts in the lowest opportunity tier.

Growth is not the same as stability. Eastern Area grew while its composition changed substantially, and the State's own instrument registers none of it. This community crosses one of HCD's three rate-of-change thresholds, the fewest of the four.

For a plan update that will shape this community's trajectory over 30 years, the absence of State designations in Eastern Area should not be read as an absence of fair housing relevant change. This is the clearest case in the plan area for the ask at 8.4.

This data documents the compositional shift and its absence from the detection instrument with precision. It does not establish why the shift occurred or why the methodology does not register it, and neither is claimed here.

2.4 Kensington-Talmadge: concentrated affluence, and an average that describes nobody

Verified figures. 4 tracts, entirely within District 9. Population **+2.9 percent** (14,460 to 14,883), the only Mid-City community growing while District 9 declined. Current median home value **$1,125,844**, the highest of the four and about **$254,500 above the citywide median of tract medians ($871,300)**. **Three Moderate Resource tracts and one Low Resource tract; no High Resource tract.** Mean opportunity score 3. Neighborhood change rate 25.0 percent (1 of 4). Current crowding 2.3 percent, the lowest of the four.

One tract, tract 20.01, is classified Persistent RCAA, independently confirmed by this organization's own classification and separately named by the City's own Fair Housing Appendix (Chapter 13). It is District 9's only RCAA-concentrated tract.

Two points on which this community is often misdescribed, including in this organization's own earlier materials:

Kensington-Talmadge does not hold the plan area's only higher-opportunity tracts. It holds no High Resource tract at all. **The plan area's single High Resource tract is tract 19, in Normal Heights.** Kensington-Talmadge's distinction is affluence concentration and home value, not opportunity tier.

Its household income is not exceptional. At about 4.3 percent above the citywide figure, arguments that this community is unusually wealthy on income do not hold at the community level.

What does hold is that the community-level figure describes nobody in it. Two of its four tracts sit at roughly $182,000 with about a quarter renters; the other two sit at roughly $79,000 with over eighty percent renters. **The dividing line runs through the middle of the community, not around it**, and a plan-area average sits well above the income of the majority of its own residents. Chapter 16 carries the tract detail.

This data documents Kensington-Talmadge's structural position in the plan area's opportunity distribution. It does not establish whether or how that position has affected who can access housing within it, which is the question the ask at 8.1 puts to the City.

2.5 Normal Heights: the plan area's highest opportunity, and its steepest racial loss

Verified figures. 4 tracts, entirely within District 9. Population **-4.4 percent** (14,126 to 13,510). Black non-Hispanic population **-76.6 percent** (1,827 to 427). **All 4 of 4 tracts carry a neighborhood change designation**, two of them carrying all three pathway types at once, the only Mid-City community where every tract is designated. Rent growth **83.1 percent**, the widest margin above the State's threshold in the plan area. **One High Resource tract and three Moderate; no Low Resource tract.** Mean opportunity score 5, matching the citywide average. Zero RCAA-concentrated tracts.

Normal Heights holds the plan area's only High Resource tract, and it has lost more than three quarters of its Black residents and more than half its children. **Its Black population decline is the steepest of any community planning area in the city** with 500 or more Black residents in 2000; the next steepest is Southeastern San Diego at -48.7 percent.

Fewer than one household in twelve has been there since 2000, the least stable tenure profile in the plan area.

These two facts sit together and the plan has to hold both. This is the plan area's higher-opportunity community and the one losing its Black residents fastest. That combination is a fair housing concern in its own right, distinct from the displacement pressure in City Heights.

This data establishes that the population decline and the designation pattern describe the same geography in the same period. It does not establish that the State's designations are responding to the Black population decline specifically, and no such link is claimed here.

2.6 What the four communities show together

Read side by side, the four profiles resolve into findings no single community's figures show alone.

1. The plan boundary contains both ends of the city's opportunity distribution, and the higher end is split between two very different communities. City Heights and Eastern Area sit entirely in the lowest opportunity tier, 22 of 30 tracts between them. The plan area's Moderate and High Resource tracts are divided between Kensington-Talmadge, which holds the affluence concentration, and Normal Heights, which holds the single High Resource tract and is changing fastest. **Neither of those is the simple "one affluent community, three poor ones" shape**, and a plan that assumes it will address the wrong geography.

2. Mid-City is losing its children at nearly three times the citywide rate. The plan area lost **15,350 residents under 18 since 2000, a 34.3 percent decline against 12.3 percent citywide**. These 30 tracts are about 10 percent of the city's tracts and account for **43 percent of San Diego's entire loss of children**. Normal Heights lost 55 percent of its children and City Heights lost 12,878. **A community that cannot keep its families is not a community a 30-year plan can treat as stable.**

3. Three of four communities added housing while losing population. City Heights, Kensington-Talmadge and Normal Heights all show units outpacing population. Eastern Area is the exception in the opposite direction, with population outpacing units. **Building alone has not held these communities together**, which is a caution against reading capacity as a fair housing answer in itself.

4. Three of four cross the State's rent-pressure threshold, and the one that does not is the one growing fastest. City Heights 73.7 percent, Kensington-Talmadge 65.2, Normal Heights 83.1, all above the 64.5 percent regional marker; Eastern Area 61.8 percent, below it.

5. Environmental burden and displacement pressure do not align inside this plan boundary the way they do citywide. Normal Heights carries the plan area's lowest environmental burden alongside its highest rent pressure and its complete designation coverage. City Heights carries the highest environmental burden alongside a designation rate below its own district's. At cluster scale across the city these two measures co-locate; **inside this plan boundary, at community scale, they do not.** Both statements hold at their own resolution.

6. The age pattern is the young-families-leaving shape in the communities under pressure. City Heights and Normal Heights show the steepest under-18 declines and paired 65+ increases. Kensington-Talmadge shows a milder under-18 decline with the largest 65+ share at the current endpoint, 15.1 percent, an aging profile rather than a pressure-driven one.

3. The Fair Housing Geography of Mid-City

3.1 Mid-City in the citywide picture

City Heights lost 8.0 percent of its population while the city grew 14.1 percent, a reversal of direction that places it at the far end of a citywide pattern rather than outside it. None of the four communities matches the supply-meeting-demand shape seen in the Northern Suburbs, where population and units grew nearly in lockstep. None matches the coastal-constraint shape of the Western Supply-Constrained cluster either.

TABLE 3.1 – MID-CITY AGAINST THE CITYWIDE SUPPLY AND POPULATION PATTERN

Geography	Population change	Unit growth	Growth gap (units - pop, pp)
Mid-City: City Heights	-8.0%	+6.3%	+14.3
Mid-City: Eastern Area	+15.4%	+9.9%	-5.5
Mid-City: Kensington-Talmadge	+2.9%	+11.3%	+8.4
Mid-City: Normal Heights	-4.4%	+7.0%	+11.4
District 9	-1.7%	+8.0%	+9.7
City of San Diego	**+14.1%**	**+21.7%**	**+7.7**
Northern Suburbs (supply meeting demand)	+43.0%	+45.9%	+2.9
Western Supply-Constrained (coastal constraint)	+7.3%	+3.6%	-3.6

Growth gaps are computed from unrounded growth rates and can differ by 0.1 point from the difference of the two printed rates.

Read against our eleven-cluster comparison of supply and demand across the city, Mid-City's growth gap is not a local anomaly. It is one instance of a citywide structure in which supply concentrates at the periphery and in redevelopment cores rather than in already-built, already-populated communities under population or rent pressure.

Whether Mid-City's growth gap reflects supply constraint specific to these four communities, broader citywide land use and zoning conditions, or some combination, is not established by a population and unit comparison alone.

3.2 Two clusters, one plan boundary

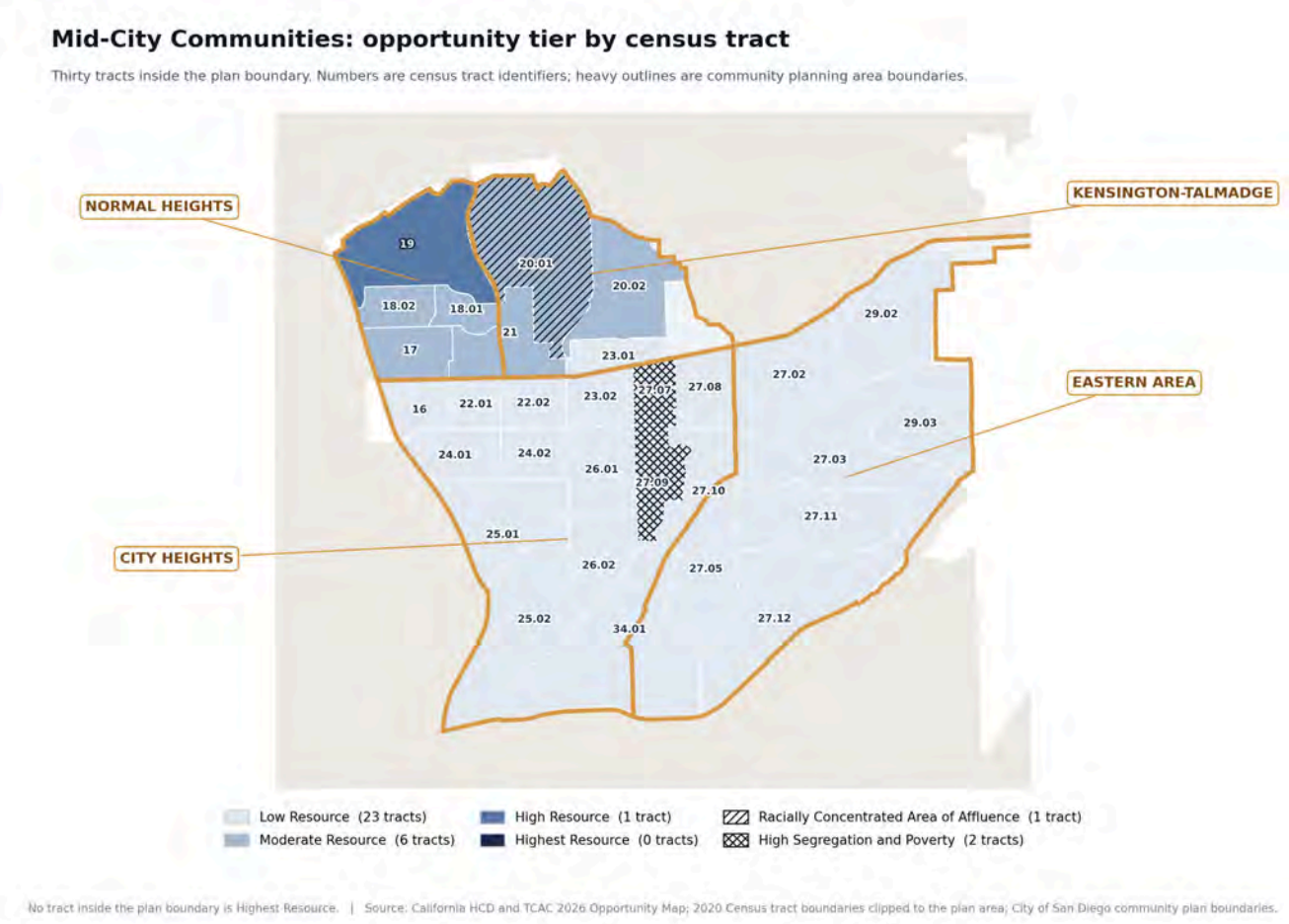
This plan boundary splits across two of this organization's regional clusters, and the two are not two versions of the same story. City Heights and Eastern Area sit inside **Southeast Communities**; Kensington-Talmadge and Normal Heights sit inside the **El Cajon Boulevard Corridor**. Southeast Communities lost population and carries an environmental burden percentile nearly double the citywide figure; the El Cajon Boulevard Corridor grew, and its environmental burden sits below the citywide figure. Full comparison in Chapter 14.

The Mid-City slice of each cluster does not track its parent. City Heights lost population more than four times faster than Southeast Communities as a whole, while Eastern Area grew 15.4 percent as that same cluster shrank 1.9 percent. Kensington-Talmadge and Normal Heights both sit below their own cluster's growth, in opposite directions from each other.

What this comparison cannot establish is why a single plan boundary spans two clusters this organization's regional analysis already treats as analytically distinct.

3.3 The opportunity map

Twenty-three of the plan area's thirty tracts sit in the lowest opportunity tier. One sits in High Resource. Six sit in Moderate. **Against a city that holds 170 High or Highest Resource tracts out of 311, this plan boundary holds one.**



The thirty tracts of the Mid-City plan boundary by State opportunity tier, with community planning area boundaries and tract numbers for reference. Hatching marks the one Racially Concentrated Area of Affluence and the two High Segregation and Poverty tracts.

That distribution is the fair housing context for every capacity and affordability decision in the draft. It is also the reason the ask at 8.6 exists: a plan confined to this boundary cannot, by itself, deliver opportunity access to the residents inside it.

3.4 The opportunity gap within the plan boundary

The opportunity map describes what tier each tract sits in. It does not describe what sits next to it, and for a resident that distinction is the one that governs daily life.

Twenty-one of the plan area's thirty tracts have no High or Highest Resource neighborhood on any of their borders. For eleven of them, every single neighboring tract sits in the lowest opportunity tier.

TABLE 3.2 – HIGHER-OPPORTUNITY NEIGHBOURS, BY COMMUNITY

	Tracts	No High or Highest neighbour	Every neighbour in the lowest tier
City Heights	15	11	7
Eastern Area	**7**	**7**	**4**
Kensington-Talmadge	4	2	0
Normal Heights	4	1	0
Mid-City	**30**	**21**	**11**

Computed from a tract adjacency table built on 2020 Census tract geometry in the California Albers projection. Shared-boundary threshold 30 metres; the result is insensitive to that choice below 100 metres.

Every one of Eastern Area's seven tracts has no higher-opportunity neighborhood on any border. That community is not only in the lowest tier; it is enclosed by it.

This is a measurement, not an inference. It carries no counterfactual, no model and no margin of error. **For a review testing whether a plan addresses access to opportunity, it is the most direct measure available**, and citywide it describes 84 tracts and about 387,000 residents.

3.5 What Mid-City can and cannot accomplish

A plan confined to this boundary cannot deliver opportunity access on its own. Twenty-nine of thirty tracts here are Low or Moderate Resource. Meaningful access to higher-opportunity neighborhoods for Mid-City residents depends on capacity created in communities outside this plan, and the plan should say so rather than leave the implication that it can solve the problem within its own lines.

What this plan can do inside its boundary is determine where its own capacity and affordability requirements land, whether its one higher-opportunity community absorbs any of the affordable housing obligation, and whether the communities carrying the burden today carry more of it tomorrow. Those are the subjects of Chapter 5.

4. What the Plan Commits To, and Where the Evidence Falls Short

4.1 What the plan actually commits to

The draft's anti-displacement and affordable housing policies are more specific than most community plans provide. The numbered policies at 2.9 through 2.18, under those two headings in Chapter 2, Land Use and Economic Prosperity, at printed pages 34 and 35, name tools rather than gesturing at intent: relocation assistance, extended tenant notice and options to return to new affordable homes to the maximum extent feasible, community land trust support, and affordable homeownership. **Policy 2.8** reads in full: "Encourage the equitable distribution of affordable housing throughout Mid-City to expand access to opportunity, avoid the concentration of affordable housing in any single neighborhood, and support mixed-income communities that promote neighborhood stability, inclusivity, and quality of life." **Policy 2.15** supports onsite very-low and low-income homes "rather than paying in-lieu fees, to the maximum extent feasible." **This is a real policy set and this review does not dispute it.**

What those policies do not establish is any way to determine whether they are working. No baseline is published, no target is stated, and no reporting mechanism is named. A commitment that cannot be evaluated cannot be enforced, by the public or by the City.

One caution about how this section should be read. The claim here is narrow and deliberately so: the policies are more specific than the norm, and they are unmeasurable. This review does not assert that the plan's fair housing strategy is adequate, because the document does not contain the analysis that would let anyone judge that. See 4.2.

4.2 The spatial fair housing test is missing

The draft invokes the duty to affirmatively further fair housing in its own words. The corresponding spatial analysis is not in the document.

The draft states that the City will affirmatively further fair housing, reverse patterns of segregation and reduce concentrations of poverty. It contains no analysis showing where its capacity lands against the opportunity map, no distribution of affordable capacity by community, and no test of the land use map against the geography of need.

That geography already exists in the City's own adopted data. The Opportunity Map, the Neighborhood Change designations, the Housing Element Fair Housing Appendix's own RCAA and RECAP designations, and the Baker Settlement's own tier-based commitment are all City or State instruments the plan could have measured itself against. None of them appears as a test in the draft.

This is the review's central finding and it is checkable by anyone in ten minutes. It does not depend on any figure this organization produced.

4.3 The fair housing rationale needs to be made explicit

Where the land use map does advance fair housing, the plan should say how, in the plan itself rather than in an appendix or by reference. A rationale that a resident cannot find and check is not a rationale the public can hold the City to.

4.4 The need for measurable outcomes

Policy 2.8 encourages equitable distribution, and the plan publishes no figure against which that policy can be tested. The plan does not publish residential capacity by community planning area, does not state existing affordable stock by community, and does not report current-cycle production by community. **All three are available to the City.** Two of them are reproduced in this document.

5. Four Fair Housing Tests for the Draft Plan

Each test below follows from a documented finding, and each can be answered from data the City already holds.

5.1 Housing growth without accelerated displacement

Higher-density development is proposed along corridors running through or directly adjacent to City Heights and Normal Heights, the two communities this review's data identifies as carrying the most severe displacement pressure. Both show population loss alongside rent growth above the State's own threshold; Normal Heights carries a designation on all four of its tracts.

Adding housing in communities already losing population to affordability pressure can be beneficial when it is paired with meaningful anti-displacement protection. Without that pairing, new development in these corridors risks accelerating the loss this review documents.

The test: for each priority corridor, what anti-displacement tools apply, and what share of new units will be affordable at what income levels?

5.2 Identifying fair housing risk beyond the State's designations

Two of the four communities show documented conditions the State's Neighborhood Change system does not register.

City Heights' designation rate, 26.7 percent, sits below District 9's own 36.4 percent, despite the plan area's highest crowding, steepest population loss, highest environmental burden and rent growth well above the State's threshold. **Eastern Area's rate is zero** despite a verified compositional shift of 26.0 percent White non-Hispanic decline against 42.1 percent growth in its population of color.

A plan using State designations as its scoping tool would correctly prioritise Normal Heights, under-prioritise City Heights, and miss Eastern Area entirely.

The test: does the plan's anti-displacement analysis supplement State designations with population change, crowding, rent trajectory and racial composition, and is that supplement reflected in corridor-level implementation guidance?

5.3 Expanding access to higher-opportunity neighborhoods

State law under AB 686 requires that cities not only avoid concentrating affordable housing in lower-opportunity areas but affirmatively promote access to higher-opportunity ones.

Inside this plan boundary that obligation lands on two communities, not one. Kensington-Talmadge holds the affluence concentration, the highest home values and District 9's only Persistent RCAA tract. Normal Heights holds the plan area's only High Resource tract, and is simultaneously losing its Black residents faster than any community in the city. **Access and stability are both at issue, in different places.**

The test: what planning tools apply in Kensington-Talmadge specifically to make its housing reachable at a broader range of incomes, and what applies in Normal Heights to hold its higher-opportunity status open to the residents already there?

5.4 Equitable distribution of affordable housing

Affordable housing in this plan area is being built where opportunity is lowest.

TABLE 5.1 – BELOW-MODERATE UNITS PERMITTED PER 1,000 EXISTING HOMES, CURRENT CYCLE

	Below-moderate units permitted per 1,000 existing
City of San Diego	11.8
Mid-City plan area	**7.6**
City Heights	**12.3**
Kensington-Talmadge	4.9
Normal Heights	2.6
Eastern Area	2.1

Below-moderate units permitted in the current RHNA cycle, from HCD Annual Progress Report Table A2, against existing housing units from the 2000-to-current stock series. Permitted, not completed.

City Heights, every one of whose fifteen tracts sits in the lowest opportunity tier, is the only one of the four producing affordable housing above the citywide rate. The three communities holding every Moderate and High Resource tract in the plan area produce at 18 to 42 percent of the citywide rate. City Heights holds 49 percent of the plan area's housing stock, 63 percent of its existing deed-restricted units, and 80 percent of its current-cycle below-moderate production.

This is a distribution finding, and it holds regardless of who builds.

It is not a finding that City Heights has too much affordable housing. Meeting housing need where lower-income households already live and expanding access to higher-opportunity neighborhoods are both fair housing objectives, and they are complements rather than substitutes. Affordable housing in City Heights should be preserved and expanded. **The finding is that the plan area's three higher-opportunity communities are producing almost none of it**, inside a single plan boundary, while the plan encourages equitable distribution and publishes no figure against which either objective can be measured.

Two figures that bear on how this is read. Mid-City permits **32.9 units per 1,000 existing units against 62.4 citywide**, roughly half the city's rate, and **about seven in ten of those permits are accessory dwelling units** against roughly two in ten citywide. In Eastern Area it is 99 percent accessory units, with **no units at all permitted in buildings of five or more.** Whatever is happening in Mid-City, large-scale development is not it.

The test: does the plan publish capacity and affordable capacity by community; does it read that distribution against **need, existing concentration, opportunity tier and development feasibility**; and does Policy 2.15's onsite preference apply where it would change the result? **Publishing the table is the first half of the test. Explaining why the distribution it shows is equitable, against those four baselines, is the second.**

5.5 Naturally occurring affordable housing: the stock the plan says it will preserve

The draft names the preservation of "naturally occurring affordable housing" as an important component of accommodating growth, at printed page 15, and cites the Housing Element's HE-H.1, "Monitor affordable rental units at risk of converting to market rents," in Table 2-3 at printed page 32. It

publishes no Mid-City baseline against which either could be tracked. This section supplies one.

A rental counts as affordable here when its gross rent is at or below 30 percent of a stated share of HUD's median family income for San Diego County, divided by twelve. At 60 percent of median family income the threshold was $805.50 a month in 2000 and is $1,792.50 now; at 80 percent, $1,074.00 and $2,390.00. No subsidy status, building age or covenant enters the test: it is a rent test on the whole rental stock, which is what "naturally occurring" means. The denominator is renter-occupied homes paying cash rent. **Units, not households**: the Census reports what a home rents for, not who lives in it.

The two thresholds tell different stories, and a preservation target has to choose.

TABLE 5.2 – SHARE OF RENTALS AFFORDABLE AT 60 PERCENT OF MEDIAN FAMILY INCOME

	Tracts	2000 share	Current share	Change (points)	Floor (points)	Affordable homes, change
City Heights	15	89.64%	52.37%	-37.3	-20.9	-7,012
Eastern Area	7	61.11%	38.03%	-23.1	-10.6	-823
Kensington-Talmadge	4	76.23%	38.48%	-37.8	-24.1	-1,138
Normal Heights	4	85.24%	43.58%	-41.7	-21.1	-2,054
Mid-City plan area	**30**	**83.01%**	**46.88%**	**-36.1**	**-20.2**	**-11,028**
City of San Diego	311	55.00%	27.57%	-27.4	-18.2	-43,004

TABLE 5.3 – SHARE OF RENTALS AFFORDABLE AT 80 PERCENT OF MEDIAN FAMILY INCOME

	Tracts	2000 share	Current share	Change (points)	Floor (points)	Affordable homes, change
City Heights	15	97.49%	84.76%	-12.7	-7.6	-2,493
Eastern Area	7	87.91%	70.38%	-17.5	-8.2	4,437 to 4,184 (see note)
Kensington-Talmadge	4	90.43%	71.56%	-18.9	-11.5	-316
Normal Heights	4	96.11%	78.90%	-17.2	-12.0	-920
Mid-City plan area	**30**	**95.00%**	**79.75%**	**-15.3**	**-9.1**	**-3,982**
City of San Diego	311	77.12%	53.05%	-24.1	-15.3	-21,717

Census 2000 (SF3 table H062, harmonised to 2020 tract boundaries) against ACS 2020-2024 (table B25063). Where a threshold falls inside a published rent bracket, the units in that bracket are counted in proportion to where the threshold sits. **Change** is the current share minus the 2000 share as printed, in points; the shares carry two decimals so that it recomputes from the two operands beside it on every row. The **floor** is the change in share when every unit in the boundary bracket is counted as affordable now and none of them in 2000, so it is the figure that survives an adversarial reading. Community figures sum units across member tracts and then divide; no figure is an average of tract shares. Eastern Area at 80 percent: the point estimate is -253 homes and the worst-case treatment of the boundary bracket is +272, so the direction of change is not established and both years' counts are stated instead. Every other row holds its direction under either treatment.

Mid-City's rental stock grew by about 1,120 homes over the period. Its stock affordable at 80 percent of median family income is still 79.8 percent, well above the citywide 53.05. Its stock affordable at 60 percent fell from 83.0 to 46.9 percent, a loss of 11,028 homes. The plan area remains a broadly affordable place at 80 percent of median family income and has stopped being one at 60 percent. The loss sits in the deeper band. **A preservation target set at 80 percent would report most of this stock as intact**, which is the practical point for HE-H.1 and for Policy 2.13.

Mid-City lost more share than the city at 60 percent (36.1 points against 27.4) and less at 80 (15.3 against 24.1); it began the period at 95 percent affordable at 80 percent and had less room to fall in that band. At 60 percent, City Heights lost the most homes (7,012) and Normal Heights the most share; the two rankings differ, and a single ordering would mislead.

These are stock figures. They say how much of the rental stock rents below a threshold. They do not say where anyone went or why, and setting them beside the plan's growth figures describes two things happening at once rather than one causing the other. Deed-restricted homes renting below the threshold are inside these counts, not subtracted from them. The community is the reportable unit: at tract level the current-vintage rent brackets are $500 wide above $1,500 and both thresholds fall inside one, so tract shares carry bands too wide to publish, and the community reports carry counts in their place.

The test: does the plan publish a naturally-occurring-affordable baseline for each community at a stated income threshold, name the threshold, and report against it annually under HE-H.1?

6. Environmental Justice and Housing

This chapter summarises. Every figure here traces to the companion corridor analysis.

6.1 Uneven environmental burden

Environmental burden inside this plan boundary ranges more widely than any other measure in this review. City Heights sits at the **74.0** CalEnviroScreen percentile, in the top quarter of census tracts statewide; Normal Heights sits at **18.1**. Eastern Area is 62.8 and Kensington-Talmadge 32.0. The citywide figure is 37.1.

6.2 Where growth and environmental burden intersect

Peak segment volumes on the fourteen roadways the companion analysis examines range from 4,400 to 44,400 vehicles a day, a tenfold spread receiving a single corridor treatment. **Twelve intersections already operate at substandard levels during peak periods.** The two study areas the plan calls transit villages, Marketplace at the Grove and Federal Boulevard at Euclid Avenue, sit where measured transit demand is weakest. And **Mid-City's 316 pedestrian injury collisions concentrate on the corridors receiving the most new capacity.**

6.3 What the plan analyses and what it does not

The City committed to an air and noise assessment for this geography in its own August 2025 Ideas Report, stating that additional density between El Cajon Boulevard and University Avenue and along the SR-15 corridor would be studied while assessing air and noise pollution.

The density is in the first draft. The assessment is not.

The plan also names an environmental justice burden along the corridors without testing its own land use pattern against it.

6.4 The appropriate policy response

The corridor analysis is explicit about what it does not claim: **no quantified exposure level and no health risk category is asserted.** What it establishes is that traffic volume and distance from the roadway vary enormously across corridors receiving a uniform designation. The response that follows is proportionate rather than prohibitive: differentiate intensity by measured volume, site the highest designations where transit demand is measured to be strongest, establish a depth gradient behind the highest-volume segments, and require filtration and protected air intakes for residential buildings within identified near-roadway zones, consistent with the California Air Resources Board's 2017 technical advisory.

7. Engagement and Accountability

7.1 What the City reports

By the draft's own count at printed page 10, more than 3,000 people (as of June 2026) provided over 10,000 comments through 108 events and two online surveys. **That is a meaningful level of participation and this review says so.**

7.2 What the City does not report

None of the published engagement data breaks those figures down by community planning area. Whether all four communities were proportionately represented cannot be determined from what the City has published.

7.3 What should be published before adoption

Normal Heights and Eastern Area both carry conditions suggesting particularly high advocacy stakes: Normal Heights for its Black population decline and complete designation coverage, Eastern Area for a compositional shift the State's instruments do not register. **If the engagement record cannot establish proportionate representation, the second draft process should include targeted outreach to each of the four planning groups.**

8. What We Ask the City to Change or Demonstrate

Each ask follows from a specific finding above and can be satisfied with data the City already holds.

8.1 Publish a Fair Housing Distribution and Opportunity table. For each of the four communities: existing units, existing deed-restricted units, current-cycle affordable production, proposed capacity, opportunity composition, RCAA status, environmental burden and transit access. **Policy 2.8 encourages equitable distribution; without this table that policy cannot be evaluated by anyone, including the City.**

8.2 Publish residential capacity by community planning area. The draft does not. Until it does, no distribution question in this review can be answered, and the City's own stated capacity ambition cannot be tested against its own fair housing duty.

8.3 Perform and publish the AFFH assessment the plan asserts. The draft states the City will affirmatively further fair housing, reverse patterns of segregation and reduce concentrations of poverty. The spatial analysis supporting those claims is absent from the document.

8.4 Supplement the State's designations with a broader displacement screen. Population change, crowding, rent trajectory and racial composition, applied at community and corridor level. **Eastern Area is the case that proves the need: zero designations, and a compositional shift of 26.0 percent against 42.1 percent.**

8.5 Make the anti-displacement commitments measurable. The anti-displacement and affordable housing policies, 2.9 through 2.18, are more specific than most plans provide and establish no way to determine whether they are working. A baseline, a target, a date and an annual report would fix that.

8.6 Address affordable housing distribution, and say what "to the maximum extent feasible" means in Policy 2.15. Affordable production is concentrated in the plan area's lowest-opportunity community. Policy 2.15 supports onsite units "rather than paying in-lieu fees, to the maximum extent feasible" and names no one to determine feasibility, no criteria and no reporting. **The ask is not that the City remove the fee option, which state law protects**; it is that the qualifier be given meaning. It matters most in Kensington-Talmadge, which holds the plan area's affluence concentration and produces affordable housing at 4.9 units per 1,000 against a citywide 11.8. **The draft already points at this work and stops short of committing to it**: 2.16 supports "evaluation of inclusionary requirements" in a manner that affirmatively furthers fair housing, and 2.17 would "consider" Mid-City's displacement risk, transit access, development feasibility and affordable housing needs as part of future updates to the City's Inclusionary Housing Ordinance. **Support and consideration, directed at a future ordinance rather than at this plan.** The ask is what triggers that evaluation, when, and against what published data. Legal basis in the supporting record at 15.4.

8.7 State what this plan cannot accomplish, and what the City will do elsewhere. Twenty-nine of thirty tracts here are Low or Moderate Resource. Opportunity access for Mid-City residents depends on capacity created in higher-resource communities. **The plan should say so and identify where.**

8.8 Complete the air and noise assessment already committed to, for the geography named in the City's own August 2025 Ideas Report, before the highest-density designations are finalised. **And differentiate residential intensity by measured roadway volume** rather than applying one corridor treatment across a tenfold range of conditions.

8.9 Publish engagement participation data by community planning area, and return to the communities the process did not reach. More than 3,000 residents were engaged across 108 events and none of it is published by community. **Low participation from City Heights would not indicate low stake.** It is the plan area's most crowded community, carries its highest environmental burden, and its residents are the least able to give a weekday evening to a thirty-year document. **A process that reads quiet as agreement will systematically underweight the community with the most at risk.** Outreach before the second draft should be scheduled, located and translated for people working long or irregular hours.

8.10 Answer community by community, not as one Mid-City. State which of the conditions documented in this review the second draft's own fair housing analysis accounts for and which it does not, in four separate answers rather than a single plan-area narrative.

9. Specific Questions for the Second Draft

We ask the Planning Department to address the following in the second draft or in public responses to comments.

1. **Does the draft plan include an anti-displacement analysis for each of the corridors the plan designates? If so, where can the public review it?**
2. **What percentage of new units along each priority corridor are proposed to be affordable, and at what AMI levels?**
3. Does the draft plan apply any anti-displacement conditions – tenant protections, right-to-return policies, relocation assistance – to areas that will see significant upzoning?
4. How does the plan address the AFFH obligation to promote access to higher-opportunity areas, specifically in Kensington-Talmadge and Normal Heights?
5. What is the residential capacity of the draft plan by community planning area?
6. Can the City publish engagement data broken down by community planning area to establish whether all four communities were proportionately represented in the plan's development?
7. Where is the air and noise assessment committed to in the August 2025 Ideas Report, and will it be completed before the highest-density designations are finalised?
8. What is the current adoption timeline? The official plan page and published news coverage describe different schedules, fall 2026 against spring 2027 for City Council consideration.

10. Conclusion: A Stronger Fair Housing Plan Is Still a Housing Plan

The Mid-City Communities Plan Update replaces a plan adopted in 1998, before California law required any of the analysis in this review. It covers the one part of the city that is the inverse of every community comprehensively updated in the last decade: one High Resource tract against sixty-three, and a neighborhood change rate double the citywide figure. **The fair housing content of this plan matters more than it did in any of the twelve that came before it.**

This review does not argue that the plan builds too much housing. Three of the four communities added units while losing population, and the plan area permits at roughly half the citywide rate with seven in ten permits being accessory units. Neither the data nor this organization supports a case against building here.

Nor does it argue that the plan does too little. The anti-displacement policies are more specific than most community plans provide.

The argument is narrower and it is about testing. The plan invokes a fair housing duty and does not measure itself against the fair housing geography the City has already adopted. It encourages equitable distribution and publishes no figure that would let anyone check. It creates capacity and does not publish that capacity by community. Every one of those gaps can be closed with data the City already holds, before adoption, without reducing a single unit.

A plan that tests where its housing lands is a stronger housing plan, not a smaller one. That is what this review asks for.

Terms used in this document

Census tract
A small statistical area the Census Bureau uses to report data, usually holding between 1,200 and 8,000 people. San Diego's city limits contain 311 of them in this analysis, 30 of which sit inside the Mid-City plan boundary. It is the smallest geography at which the figures in this review can be reported.

Community planning area (CPA)
The City of San Diego's own neighborhood planning boundaries. City Heights, Eastern Area, Kensington-Talmadge and Normal Heights are each one, and together they make up the Mid-City Communities Plan boundary. Every figure here that names a neighborhood uses these official boundaries.

Opportunity tier
A four-level ranking published by California's housing department and tax credit committee, placing every census tract in the state in Low, Moderate, High or Highest Resource based on measures of education, economic conditions and environment. It is the State's classification, not this organization's.

Low Resource
The lowest of the State's four opportunity tiers. Twenty-three of the thirty tracts in the Mid-City plan boundary sit here, against 95 of 311 citywide.

Moderate Resource
The second of the State's four opportunity tiers. Six Mid-City tracts sit here.

High Resource
The third of the State's four opportunity tiers. One Mid-City tract sits here, in Normal Heights.

Highest Resource
The top of the State's four opportunity tiers. No tract inside the Mid-City plan boundary sits here; 117 tracts citywide do.

Neighborhood change area
A tract carrying one of the State's Neighborhood Change pathway designations, its marker for a historically lower-income community of color that has since seen substantial racial and economic change. Nine of the thirty Mid-City tracts carry one, against 44 of 311 citywide.

Neighborhood Change pathway
The State's method for identifying neighborhood change, published in 2026. A tract can qualify under Pathway 1A, 1B or 2, each testing a different combination of historical condition, demographic change and housing-cost pressure. This review refers to a tract carrying any of them as a neighborhood change area.

Rate-of-change threshold
Part of the State's neighborhood change method. A tract is tested against regional benchmarks for how fast its income, its racial composition and its rents have moved. The rent benchmark for the San Diego region is 64.5 percent growth since 2013.

Racially Concentrated Area of Affluence (RCAA)
A neighborhood where high-income, predominantly non-Hispanic White households are concentrated well above the regional norm. State law now requires every California jurisdiction's housing element to analyse these areas specifically. One tract inside the Mid-City plan boundary carries this classification.

Persistent RCAA
A tract classified as a Racially Concentrated Area of Affluence at every point measured, rather than one that has recently become or ceased to be one. Tract 20.01 in Kensington-Talmadge is District 9's only one.

RECAP
A Racially and Ethnically Concentrated Area of Poverty, the counterpart to an RCAA. The City's own Housing Element Fair Housing Appendix places two City Heights tracts inside its RECAP cluster.

Affirmatively furthering fair housing (AFFH)
The legal duty, under California Government Code section 8899.50 and AB 686, to take meaningful actions that overcome patterns of segregation and foster inclusive communities, rather than simply avoiding discrimination. It applies to a community plan update as it does to a housing element.

AB 686
A 2018 California law, effective 2019, requiring every housing element to include a data-driven, geographically specific analysis of segregation patterns, disparities in access to opportunity and concentrated poverty, and to set goals and actions addressing what that analysis finds.

AB 1304
A 2021 California law, in effect from 2022, that sharpened AB 686 by requiring every housing element's fair housing analysis to identify racially or ethnically concentrated areas of affluence as well as of poverty, and to show how the sites the jurisdiction plans for housing affirmatively further fair housing. It applies statewide.

Baker Settlement
A binding commitment the City of San Diego entered in March 2025, agreeing to show that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. It is a reporting duty rather than a requirement to build, and it counts projects rather than homes.

CalEnviroScreen
California's tool for scoring cumulative pollution burden and community vulnerability, reported as a statewide percentile from 0 to 100. A higher number means greater burden. City Heights sits at 74.0 against a citywide 37.1.

RHNA
The Regional Housing Needs Allocation, the State's assignment to each jurisdiction of how many homes it must plan for, by income level, over an eight-year cycle.

Capacity
What a plan's land use map would allow to be built, if every site that could redevelop did. It is not a forecast of what will be built, and this review does not treat it as one. The draft does not publish capacity by community planning area.

Permitted
A home the City has authorised. It is not yet a home that exists. This review reports production as permitted or as completed and never computes a rate between the two.

Completed
A home that has been built and finished, as distinct from one that has been permitted.

Below-moderate housing
Homes permitted at any affordability level other than above-moderate: the moderate tier and every tier below it. In practice these are deed-restricted affordable units. This review reports it as units permitted per 1,000

existing homes so communities of different sizes can be compared.

Deed-restricted

A home carrying a legal restriction that keeps it affordable to households at a stated income level for a set period, rather than one that happens to be inexpensive at the moment.

Accessory dwelling unit (ADU)

A small secondary home on a lot that already has a house, sometimes called a granny flat or backyard unit. About seven in ten housing permits in Mid-City are for these, against about two in ten citywide.

Suitable sites inventory

The list of parcels a jurisdiction identifies as able to accommodate its assigned housing need. The City's own inventory places 36.3 percent of its suitable sites inside areas it identifies as carrying displacement risk.

Crowding

A household living at more than one person per room. City Heights' rate is 15.7 percent against a citywide 5.8 percent.

Growth gap

The difference between a community's housing unit growth and its population growth, in percentage points. A positive gap means units were added faster than people arrived. Two of the four Mid-City communities added housing while losing population, and three of the four added housing faster than people arrived.

Displacement risk area

A geography the City's own Housing Element Fair Housing Appendix identifies as carrying elevated risk that lower-income residents will be pushed out. All four Mid-City communities appear in the City's lists.

Margin of error

The range within which a survey estimate is likely to fall. American Community Survey figures for small areas carry wide margins, which is why this review reports some measures at community level rather than tract level.

Fair Housing Findings on the Mid-City Plan Update

Fifteen findings for City Planning, the Council offices covering the plan area, and the Mayor's office. Each finding is one page and stands on its own.

WHY THIS PLAN UPDATE IS UNLIKE ANY OTHER

The plan being replaced was adopted on 4 August 1998. AB 686, the Baker Settlement and the State's Opportunity Map and Neighborhood Change methods all came afterward, so this is the first time these four communities have been planned under the fair housing law that now governs the work.

Since 2016 the City has comprehensively updated twelve community plans. Those twelve cover 96 census tracts, 63 of them in the State's High or Highest Resource tiers, and 14 carrying a neighborhood change designation. **This plan covers 30 tracts. One is High Resource. Twenty-three sit in the State's lowest tier, and nine carry a change designation, double the citywide rate.** Nine of the twelve earlier plans contain no change area at all. Measured on the two instruments the State itself uses, Mid-City is close to the inverse of everything the City has planned in the last decade.

The same boundary holds one of the two clusters of high segregation and poverty the City's own Fair Housing Appendix identifies, and one of its three Racially Concentrated Areas of Affluence. The fair housing content of this plan therefore carries weight no recent update did. The draft asserts that content; the analysis behind it is not in the document. Every gap named below can be closed before adoption with data the City already holds, without reducing a single home.

THE FINDINGS

A. THE FAIR HOUSING TEST THE PLAN DOES NOT RUN

1. **Say what this plan cannot accomplish inside its boundary**, and where the City will act instead.
2. **Perform and publish the AFFH analysis the draft asserts** at printed page 14.
3. **Publish residential capacity by community.** The total is on page 15; the split is not.
4. **Publish a fair housing distribution table.** Affordable homes are permitted where opportunity is lowest.
5. **Say what "to the maximum extent feasible" means** in Policy 2.15; give Policies 2.16 and 2.17 a date.
6. **Make the anti-displacement policies measurable**: baseline, target, date, annual report.

B. WHAT THE STATE'S INSTRUMENTS MISS, AND WHAT THE PLAN MUST HOLD

7. **Screen for displacement beyond the State's designations.** Eastern Area carries none.
8. **Hold access and stability at once.** Kensington-Talmadge and Normal Heights need different things.
9. **Set a NOAH baseline at 60 and 80 percent** of median family income, and report against it.
10. **Report the loss of children as a plan condition**: 43 percent of the city's entire loss.

C. WHERE THE CAPACITY IS PLACED

11. **Complete the committed air and noise assessment**; set intensity by measured roadway volume.
12. **Site transit villages where transit demand is measured**; re-justify College Grove and Federal at Euclid.
13. **Reconcile Figure 2-1 with Figure 5-1.** The map does not deliver the framework's transition.
14. **Address corridor conditions alongside intensity**: 316 pedestrian injury collisions, most on these corridors.

D. PROCESS

15. **Publish engagement by community**, and return to the communities the process did not reach.

The City should say plainly what this plan can and cannot accomplish, and where in the rest of the city it intends to create the opportunity access that Mid-City residents cannot reach from here.

> **Twenty-one of the thirty tracts in this plan area have no High or Highest Resource neighborhood on any of their borders. For eleven of them, every neighboring tract is in the State's lowest tier as well.** A plan drawn only inside this boundary cannot fix that on its own.

EVIDENCE

The Opportunity Map describes the tier each tract sits in. It does not describe what sits next to it, and for a resident that distinction governs daily life: the school across the boundary, the job a bus ride away, the neighborhood a family could move to without leaving the area they know. Twenty-nine of thirty tracts here are Low or Moderate Resource. Against a city that holds 170 High or Highest Resource tracts out of 311, this plan boundary holds one, in Normal Heights.

Community	Tracts	No High or Highest neighbor	Every neighbor in the lowest tier
City Heights	15	11	7
Eastern Area	7	7	4
Kensington-Talmadge	4	2	0
Normal Heights	4	1	0
Mid-City plan area	**30**	**21**	**11**

Tract adjacency computed on 2020 Census geometry with a 30-metre shared-boundary threshold; results are unchanged at any threshold below 100 metres. Opportunity tiers are HCD and TCAC's 2026 classifications. This is a measurement of the map, not a model.

- **Every one of Eastern Area's seven tracts** has no higher-opportunity neighborhood on any border. That community is not only in the lowest tier; it is enclosed by it.
- What this plan *can* do inside its boundary is decide where its own capacity and affordability requirements land (Findings 3 and 4), whether its higher-opportunity communities absorb any of the affordable obligation (Finding 8), and whether the communities carrying the burden today carry more of it tomorrow.
- What it cannot do is deliver access to High or Highest Resource neighborhoods, because there are almost none inside the line. That depends on capacity created in other community plans, and the draft should say so rather than leave the implication that it can solve the problem within its own boundary.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Figure 2-1, Planned Land Uses, printed p. 13, with the designations at pp. 16 to 25; the fair housing statement at printed p. 14. Also **Introduction**, General Plan Housing Element paragraph, printed p. 10.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 3.3 to 3.5 and request 8.7.

Perform and publish the affirmatively furthering fair housing analysis the draft says it is carrying out.

> **The draft states, in its own words, that the City is reversing patterns of segregation and reducing concentrations of poverty, consistent with local, state and federal fair housing law. The spatial analysis that would show it is not in the document.** This is checkable by anyone in ten minutes and depends on no figure we produced.

WHAT THE DRAFT SAYS, AT PRINTED PAGE 14

> *"The City is committed to eliminating disparities in housing access and affirmatively furthering fair housing by working to reverse patterns of segregation, reducing concentrations of poverty, and ensuring that people of all incomes have the choice to live in communities with access to opportunity free from discrimination, consistent with local, state, and federal fair housing laws."*

THE ANALYSIS THE STATEMENT CALLS FOR, AND WHERE IT IS ABSENT

- No analysis showing where the plan's residential capacity lands against the State's Opportunity Map.
- No distribution of affordable capacity, or of existing affordable stock, by community planning area.
- No test of the land use map (Figure 2-1) against the geography of need: the Neighborhood Change designations, the City's own RCAA and RECAP designations, or the tier-based commitment the City entered in March 2025.
- No statement, where the land use map does advance fair housing, of how it does so, in the plan itself rather than by reference.

WHY THE INSTRUMENTS ARE ALREADY IN HAND

Every instrument such an analysis would use is adopted and public: California HCD and TCAC's 2026 Opportunity Map, the State's Neighborhood Change designations, the City's Housing Element Fair Housing Appendix, and the Baker Settlement's reporting commitment. The plan could have measured itself against any of them. None appears as a test in the draft. A rationale a resident cannot find and check is not a rationale the public can hold the City to.

The draft's anti-displacement and equity policies are more specific than most community plans provide, and this comment does not dispute them. The point is narrower: the document asserts a fair housing outcome and does not show its work. The land use concepts presented to the Planning Commission in March 2026 included one named "Transit Villages, Corridors and Neighborhoods + Fair Housing"; the draft does not say what that addition consisted of or whether it was carried forward.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. "Balanced and Equitable Communities," printed p. 14. Also **Introduction**, General Plan Housing Element paragraph, printed p. 10.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 4.2 and 4.3, request 8.3, Chapter 9, question 4. Quote the plan at full length; a shortened version drops the clause that ties the commitment to fair housing law.

Publish residential capacity by community planning area. The plan-area total is already on page 15; the split among the four communities is not.

> **Table 2-1 puts the plan area's possible net new homes at 42,000 over the 30-year horizon, from 53,500 to 95,500.** The draft does not say how much of that lands in City Heights, Eastern Area, Kensington-Talmadge or Normal Heights. Until it does, no distribution question in this comment can be answered, including by the City.

EVIDENCE

Table 2-1, Development Potential (printed p. 15)	Year 2025	Possible net future change	Horizon total
Population (people)	138,000	89,000	227,000
Residential (homes)	53,500	42,000	95,500
Non-residential (square feet)	13,300,000	1,900,000	15,200,000

The draft's contents and text call this Table 2-1; its caption on page 15 reads Table 2-2. The City's public materials describe the update as capacity for about 30,000 homes. Both figures are the City's; no document reconciles them, and this comment does not adopt either as a premise.

- **Policy 2.8 encourages "the equitable distribution of affordable housing throughout Mid-City."** Equitable distribution is a claim about shares. Without capacity by community there is no denominator, and the commitment cannot be evaluated by the public or by the City.
- The four communities are not interchangeable. City Heights holds roughly half the plan area's population and its highest crowding; Normal Heights holds the only High Resource tract; Kensington-Talmadge holds the affluence concentration; Eastern Area is the one community where population growth has outpaced housing growth. A single total conceals which of them is being asked to carry the growth.
- The City already holds the figure. Table 2-1 was built by summing parcel-level capacity across the land use map; the same computation grouped by community planning area produces the four-row table this comment asks for.
- Capacity is what the map allows, not a forecast. Three of the four communities added homes while losing population, and the plan area permits at roughly half the citywide rate. Publishing capacity by community asks what the plan assumes, not what the market will deliver.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Table 2-1 (captioned Table 2-2), "Planning Horizon," printed p. 15; Policy 2.8, printed p. 34.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 1.4 and 4.4, request 8.2, Chapter 9, question 5.

Publish a Fair Housing Distribution and Opportunity table for the four communities, because affordable housing in this plan area is being permitted where opportunity is lowest.

> **City Heights, every one of whose fifteen tracts sits in the State's lowest opportunity tier, is the only community of the four permitting affordable homes above the citywide rate.** The three communities that hold every Moderate and High Resource tract in the plan area permit at 18 to 42 percent of that rate.

EVIDENCE

Below-moderate homes permitted per 1,000 existing	
City of San Diego	*11.8*
Mid-City plan area	**7.6**
City Heights (15 Low Resource tracts)	12.3
Kensington-Talmadge	4.9
Normal Heights	2.6
Eastern Area	2.1

Current RHNA cycle, HCD Annual Progress Report Table A2, against existing units. Permitted, not completed.

- City Heights holds **49 percent** of the plan area's homes, **63 percent** of its existing deed-restricted homes, and **80 percent** of its current-cycle below-moderate permits.
- Mid-City as a whole permits **32.9 homes per 1,000 existing against 62.4 citywide**, and about seven in ten of those permits are accessory dwelling units, against roughly two in ten citywide. In Eastern Area it is 99 percent ADUs, with no homes permitted in buildings of five or more.
- This is a distribution finding and it holds regardless of who builds.

Affordable housing in City Heights should be preserved and expanded. Meeting need where lower-income households already live and expanding access to higher-opportunity neighborhoods are both fair housing objectives, and they are complements, so this is not a finding that City Heights has too much. The finding is that the plan area's three higher-opportunity communities are producing almost none, inside one plan boundary, while Policy 2.8 encourages equitable distribution and the plan publishes no figure against which that can be measured.

The table the City should publish, for each of the four communities: existing homes, existing deed-restricted homes, current-cycle affordable permits, proposed capacity and affordable capacity, opportunity-tier composition, RCAA status, environmental burden and transit access. Publishing it is the first half of the test. Explaining why the distribution it shows is equitable, against need, existing concentration, opportunity tier and development feasibility, is the second.

A question that follows from a commitment already made. In the March 2025 Baker Settlement the City agreed to include data that demonstrates that by at least 2028, at least 70 percent of affordable housing projects in the City are permitted in Moderate, High or Highest Resource areas. The plan area's seven tracts at Moderate or above sit entirely in Kensington-Talmadge and Normal Heights, and the draft does not say what share of affordable homes those seven are expected to carry.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Policy 2.8, "Balanced and Equitable Communities," printed p. 34; "Anti-Displacement and Affordable Housing," printed pp. 14 to 15.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, section 5.4 and request 8.1; Baker Settlement terms per the SDHC settlement approval staff report, March 2025.

Say what "to the maximum extent feasible" means in Policy 2.15, and turn Policies 2.16 and 2.17 from support and consideration into a trigger, a date and published data.

> **Policy 2.15 supports onsite very-low and low-income homes in market-rate projects "rather than paying in-lieu fees, to the maximum extent feasible." The plan does not say who determines feasibility, against what criteria, or how the public would learn the result.** The difference between an onsite home and a fee matters most in Kensington-Talmadge, which permits affordable homes at 4.9 per 1,000 existing against 11.8 citywide.

WHAT THE THREE POLICIES SAY, AT PRINTED PAGE 35

- **2.15** "Support inclusion of onsite very-low and low-income affordable housing within market-rate residential and mixed-use projects rather than paying in-lieu fees, to the maximum extent feasible."
- **2.16** "Support evaluation of inclusionary requirements to ensure the equitable provision of affordable housing in a manner that affirmatively furthers fair housing and advances anti-displacement goals in Mid-City."
- **2.17** "Consider local housing conditions in Mid-City, including displacement risk, transit access, development feasibility, and affordable housing needs, as part of future updates to the City's Inclusionary Housing Ordinance."

WHAT THE ASK IS, AND WHAT IT IS NOT

State law protects the in-lieu fee option, and this comment does not ask the City to remove it. AB 1505 (2017), now Government Code section 65850.01, restored the City's authority to apply inclusionary requirements to rental housing and requires that any such ordinance offer alternative means of compliance, including a fee. A demand to eliminate the fee would ask for something the statute forbids.

What the statute leaves available is a stated preference, applied through published criteria and reported afterward. That is what this finding asks for: a named decision-maker for the feasibility determination, the criteria it uses, and a public record of how often onsite homes were delivered against how often a fee was paid, by community.

The draft already points at this work and stops short of committing to it. Policies 2.16 and 2.17 are stated as support and consideration, directed at a future Inclusionary Ordinance update rather than at this plan. The question for the second draft is what would trigger that evaluation, when it would occur, and against what published data. Finding 4 supplies the data that would make the evaluation possible.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Policies 2.15, 2.16 and 2.17, "Affordable Housing," printed p. 35. **Implementation**, Chapter 8, for where a reporting mechanism would live.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, request 8.6; AB 1505 (2017), Government Code section 65850.01; San Diego Municipal Code Chapter 14, Article 2, Division 13.

Make the anti-displacement commitments measurable: a baseline, a target, a date and an annual public report, without changing a single policy.

> **Policies 2.9 through 2.18 are more specific than most community plans provide. They name tools rather than gesturing at intent.** None of them has a baseline, a target or a reporting mechanism, so no one, including the City, can determine whether they are working.

WHAT THE DRAFT COMMITS TO, AT PRINTED PAGES 34 AND 35

Relocation assistance for tenants of homes to be demolished or converted (2.9). Preserving residents' ability to continue living in the community (2.10). Extended notice and options to return to new affordable homes, to the maximum extent feasible, when demolition is proposed (2.11). Community land trust and acquisition programs (2.12). Production and preservation of affordable housing (2.13). Affordable homeownership for local residents (2.14). Onsite affordable homes over fees (2.15). And, in 2.8, the equitable distribution of affordable housing throughout Mid-City. **This is a real commitment set and this comment does not dispute it.**

WHAT IS MISSING

- **A baseline.** The plan publishes no starting figure for any of the conditions these policies address: existing affordable stock by community, crowding, household size, rent trajectory, the under-18 population, or the share of rentals affordable at 60 and 80 percent of median family income (Finding 9).
- **A target and a date.** A commitment to "encourage" equitable distribution cannot be met or missed. A share, a year and a community-level breakdown can be.
- **A report.** Chapter 8, Implementation, is where the plan's implementing mechanisms sit. An annual report on displacement and affordable housing conditions, by community, belongs there, alongside the Housing Element policy the draft itself cites at Table 2-3: HE-H.1, "Monitor affordable rental units at risk of converting to market rents."

The measures in Findings 7, 9 and 10 (a broader displacement screen, the NOAH baseline, and the loss of children) are the content of that baseline. All of them are available to the City today from Census, HCD Annual Progress Report and its own permit data, at community planning area resolution.

A commitment that cannot be evaluated cannot be enforced, by the public or by the City. Adding the measurement changes none of the policies and would make each of them mean something.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Policies 2.8 to 2.18, printed pp. 34 to 35; Table 2-3, Relevant General Plan Policies, HE-H.1, printed p. 32. **Implementation**, Chapter 8, from printed p. 153.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 4.1 and 4.4, request 8.5.

Supplement the State's Neighborhood Change designations with a broader displacement screen, applied at community and corridor level, using population change, crowding, rent trajectory and racial composition.

> **Eastern Area carries zero neighborhood change designations across all seven of its tracts. Over the same period it grew 15.4 percent, its White non-Hispanic population fell 26.0 percent, and its population of color grew 42.1 percent.** A plan that uses the State's designations as its scoping tool would miss this community entirely.

EVIDENCE

	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	District 9	City
Neighborhood change designation rate	26.7% (4 of 15)	0.0% (0 of 7)	25.0% (1 of 4)	100% (4 of 4)	36.4%	14.1%
Population change, 2000 to current	-8.0%	+15.4%	+2.9%	-4.4%	-1.7%	+14.1%
Current crowding rate	15.7%	7.7%	2.3%	2.8%	10.0%	5.8%
Rent change, population-weighted (State's marker 64.5%)	73.7%	61.8%	65.2%	83.1%	70.1%	64.8%
CalEnviroScreen 5.0 percentile	74.0	62.8	32.0	18.1	58.3	37.1

Census 2000 against ACS 2020-2024. Designations are HCD's 2026 Neighborhood Change pathways. Sourcing by cell in the review's Chapter 18.

- **City Heights is designated on 4 of 15 tracts, below its own district's rate**, despite the plan area's highest crowding (more than double the citywide rate), its steepest population loss, its highest environmental burden, and rent growth well above the State's threshold.
- **Eastern Area crosses one of HCD's three rate-of-change thresholds**, the fewest of the four, and so registers nothing. Growth is not the same as stability; this community grew while its composition changed substantially, and the State's instrument records none of it.
- A plan scoped by State designations would correctly prioritise Normal Heights, under-prioritise City Heights, and miss Eastern Area. The draft's own equity chapter names displacement from past infrastructure decisions; the same attention belongs on the displacement the land use map could produce.

The data documents the compositional shift and its absence from the detection instrument. It does not establish why the shift occurred, and this comment does not claim it does. **The test for the second draft:** does the anti-displacement analysis supplement State designations with these four measures, and is that supplement reflected in corridor-level implementation guidance?

IN THE DRAFT PLAN

Land Use and Economic Prosperity. "Anti-Displacement and Affordable Housing," printed pp. 14 to 15; Policies 2.9 to 2.12, p. 34 to 35. **Sustainability, Equity, Resilience and Conservation**, "Equity," printed p. 61.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 2.2, 2.3 and 5.2, request 8.4; Eastern Area and City Heights community reports (Appendices 1 and 2 to the review).

Hold both fair housing obligations at once: make Kensington-Talmadge reachable at a broader range of incomes, and hold Normal Heights' higher-opportunity status open to the residents already there.

> **Inside this plan boundary the duty to expand access to opportunity lands on two communities, not one, and they need different things.** Kensington-Talmadge holds the affluence concentration and District 9's only Persistent RCAA tract. Normal Heights holds the plan area's single High Resource tract, and has lost more than three quarters of its Black residents since 2000.

KENSINGTON-TALMADGE: ACCESS

- Four tracts, entirely in District 9. Three Moderate Resource, one Low Resource, **no High Resource tract.**
- Current median home value **$1,125,844**, the highest of the four, about $254,500 above the citywide median of tract medians.
- Tract 20.01 is **Persistent RCAA** by the Lab's own classification and separately named as Kensington in the City's own Fair Housing Appendix, one of three Racially Concentrated Areas of Affluence in the city.
- The community average describes nobody in it. Two tracts sit near $182,000 in household income with about a quarter renters; the other two near $79,000 with over 80 percent renters. **The dividing line runs through the middle of the community, not around it.**
- Permits affordable homes at **4.9 per 1,000 existing**, against 11.8 citywide.

NORMAL HEIGHTS: STABILITY

- Four tracts, entirely in District 9. One High Resource, three Moderate; **the plan area's only High Resource tract** is here (tract 19).
- Black non-Hispanic population **-76.6 percent**, 1,827 to 427, the steepest decline of any community planning area in the city with 500 or more Black residents in 2000. The next steepest is Southeastern San Diego at -48.7.
- **All four tracts carry a neighborhood change designation**, two of them all three pathway types at once. Rent growth 83.1 percent, the widest margin above the State's marker in the plan area.
- Lost 55 percent of its children; fewer than one household in twelve has been there since 2000.
- Permits affordable homes at **2.6 per 1,000 existing.**

State law under AB 686 asks cities not only to avoid concentrating affordable housing in lower-opportunity areas but to affirmatively promote access to higher-opportunity ones. Here that means two different questions. **What planning tools apply in Kensington-Talmadge specifically** to make its housing reachable at a broader range of incomes? **And what applies in Normal Heights** to hold its higher-opportunity status open to the residents already there, while it changes faster than any community in the plan area? The draft answers neither by community; Policy 2.8 speaks of Mid-City as one place.

The population decline and the designation pattern in Normal Heights describe the same geography over the same period. This comment does not claim the State's designations respond to the Black population decline specifically.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. Policy 2.8, printed p. 34; Figure 2-1 as it applies to Kensington-Talmadge and Normal Heights, printed p. 13 and pp. 16 to 25.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, sections 2.4, 2.5 and 5.3; Chapter 9, question 4; Kensington-Talmadge and Normal Heights community reports (Appendices 3 and 4 to the review); City of San Diego Housing Element Fair Housing Appendix.

Set a baseline for naturally occurring affordable housing in each of the four communities, at both 60 and 80 percent of median family income, and report against it. The two thresholds tell different stories.

> **At 80 percent of median family income Mid-City is still a broadly affordable place: 79.8 percent of its rentals, against 53.1 percent citywide. At 60 percent it has stopped being one: 83.0 percent of rentals in 2000, 46.9 percent now, a loss of 11,028 homes.** A preservation target set at 80 percent would report most of this stock as intact.

EVIDENCE

Share of rentals affordable at each threshold	2000	Now	Change (points)	Floor	Homes
60 percent of MFI (rent at or below $805.50 then, $1,792.50 now)					
City Heights	89.64%	52.37%	-37.3	-20.9	-7,012
Eastern Area	61.11%	38.03%	-23.1	-10.6	-823
Kensington-Talmadge	76.23%	38.48%	-37.8	-24.1	-1,138
Normal Heights	85.24%	43.58%	-41.7	-21.1	-2,054
Mid-City, all four	**83.01%**	**46.88%**	**-36.1**	**-20.2**	**-11,028**
City of San Diego	*55.00%*	*27.57%*	*-27.4*	*-18.2*	
80 percent of MFI (rent at or below $1,074.00 then, $2,390.00 now)					
City Heights	97.49%	84.76%	-12.7	-7.6	-2,493
Eastern Area	87.91%	70.38%	-17.5	-8.2	4,437 / 4,184*
Kensington-Talmadge	90.43%	71.56%	-18.9	-11.5	-316
Normal Heights	96.11%	78.90%	-17.2	-12.0	-920
Mid-City, all four	**95.00%**	**79.75%**	**-15.3**	**-9.1**	**-3,982**
City of San Diego	*77.12%*	*53.05%*	*-24.1*	*-15.3*	

A rental counts as affordable when its gross rent is at or below 30 percent of that share of HUD median family income for San Diego County. Units, never households: the Census reports what a home rents for, not who lives in it. Census 2000 against ACS 2020-2024; denominator is renter-occupied homes paying cash rent. **Change** recomputes from the two shares beside it. **Floor** is the change in share under the least favourable treatment of the rent bracket containing the threshold in both years, the figure that survives an adversarial reading. *Eastern Area at 80 percent: direction not established; both years' counts are stated. Mid-City lost more than the city at 60 percent (-36.1 points against -27.4) and less at 80 (-15.3 against -24.1); it began the period at 95 percent affordable at 80.

- The draft names preservation of "naturally occurring affordable housing" as an important component of accommodating growth (printed p. 15) and cites HE-H.1 on monitoring at-risk rentals (Table 2-3, printed p. 32). It publishes no Mid-City baseline against which either could be tracked.
- These are stock figures: how much of the rental stock rents below a threshold, not where anyone went or why. Community level is the reportable unit; tract-level shares carry bands too wide to publish.

IN THE DRAFT PLAN

Land Use and Economic Prosperity. "Anti-Displacement and Affordable Housing," printed p. 15; Table 2-3, HE-H.1, printed p. 32; Policy 2.13, printed p. 35.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, section 5.5, Tables 5.2 and 5.3; the four community reports.

Report the plan area's loss of children as a plan condition, and carry it into the anti-displacement baseline. A community that cannot keep its families is not one a 30-year plan can treat as stable.

> **The plan area lost 15,350 residents under 18 since 2000, a 34.3 percent decline against 12.3 percent citywide. These thirty tracts are about a tenth of the city's, and they account for 43 percent of San Diego's entire loss of children.** The Introduction reports population and housing growth (Table 1-2, Figure 1-3) without saying who left.

EVIDENCE

Age composition, 2000 to current	City Heights	Eastern Area	Kensington-Talmadge	Normal Heights	City
Under-18 share of population	36.6% to 23.0%	25.6% to 21.8%	20.2% to 15.3%	22.2% to 10.4%	24.4% to 18.8%
Under-18 change, count	**-12,878**	-128	-613	**-1,731**	-35,591
65 and over, share	5.3% to 10.6%	11.6% to 12.7%	11.0% to 15.1%	6.9% to 10.2%	10.6% to 14.9%
Total population change	-8.0%	+15.4%	+2.9%	-4.4%	+14.1%
Housing unit growth	+6.3%	+9.9%	+11.3%	+7.0%	+21.7%

Census 2000 against ACS 2020-2024, by direct query against age-bracket counts; shares from each community report's Section 7.

- **City Heights lost 12,878 children, the largest absolute loss of any community planning area in the city.** Its housing units grew 6.3 percent while its population fell 8.0 percent; occupied homes rose about 4 percent while average household size fell from 3.36 to 2.96. City Heights gained households and lost people.
- **Normal Heights lost 55 percent of its children**; its under-18 share fell from 22.2 to 10.4 percent, the lowest in the plan area.
- Three of the four communities added homes while losing population. Building alone has not held these communities together, which is a caution against reading capacity as a fair housing answer in itself.
- The age pattern in City Heights and Normal Heights is the young-families-leaving shape: steep under-18 declines paired with rising 65-and-over shares. Kensington-Talmadge shows a milder under-18 decline and now carries the largest 65-and-over share in the plan area, an aging pattern rather than a pressure-driven one.

What the data does not establish is why household size fell. Smaller households forming, larger households leaving, and turnover replacing large households with small ones all produce this pattern, and this comment does not choose among them. What it asks is that the plan report the condition, by community, and treat the retention of families as something its anti-displacement policies (Finding 6) are measured against.

IN THE DRAFT PLAN

Introduction. Table 1-2, City of San Diego and Mid-City Population Change 2000 to 2024, and Figure 1-3, printed p. 9. **Land Use and Economic Prosperity**, "Anti-Displacement," printed pp. 14 to 15.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, section 2.6 (items 2, 3 and 6) and Table 2.2; City Heights and Normal Heights community reports, Section 7.

Complete the air and noise assessment the City committed to in August 2025 before the highest-density designations are finalised, and set residential intensity by measured roadway volume rather than one corridor treatment across a tenfold range.

> **The Draft Ideas Report of August 2025 said the additional density between El Cajon Boulevard and University Avenue and along SR-15 would be studied "while assessing considerations related to fair housing, air and noise pollution, and feasibility testing." The density is in the first draft. The assessment is not.**

EVIDENCE

Designated corridor	Daily traffic
College Avenue	25,200 to 44,400
Euclid Avenue	6,300 to 34,400
Home Avenue	17,300 to 32,400
University Avenue	11,000 to 29,100
El Cajon Boulevard	14,600 to 21,800
Fairmount Avenue	4,700 to 18,900
Adams Avenue	5,800 to 15,800
Federal Boulevard	5,400 to 9,400
Orange Avenue	2,400 to 6,800
Chollas Parkway	4,400

City's Draft Existing Conditions Mobility Assessment, Table 6.7 and Figure 5.3. Segment ranges within each corridor.

- Peak segment volumes on the designated corridors run from **4,400 vehicles a day on Chollas Parkway to 44,400 on College Avenue** under a single corridor designation. Fairmount Avenue varies fourfold along its own length; a corridor-wide designation cannot be right at both ends.
- **The draft's own Chapter 4 names the burden.** At printed pages 61 and 62 it says Mid-City communities "are closely situated to high-traffic corridors," that traffic-related pollutants "are known to worsen respiratory and cardiovascular health," and that "this pattern of freeway pollution likely helps explain higher asthma burdens." The analysis and the response both stop at the freeways: Policy 4.10 encourages air-pollution building features within 500 feet of a freeway (printed p. 78). The arterial corridors carrying the highest residential designations get no exposure analysis, no comparable standard, and no health risk assessment.

A PROPORTIONATE RESPONSE

The City's own data show enough variation among corridors to warrant a differentiated response, with no exposure level or health risk category asserted here, following the California Air Resources Board's 2017 advisory: **concentrate the highest designations at nodes** on College, Euclid, Home and University and step intensity back from the roadway edge; **differentiate by segment** on El Cajon, Fairmount, Adams and 54th; **use the roadway edge for active commercial frontage**; and **require filtration and protected air intakes** for homes in near-roadway zones. On Chollas Parkway, Orange, Federal and College Grove Drive, roadway exposure is not the governing consideration, and this comment says so.

IN THE DRAFT PLAN

Sustainability, Equity, Resilience and Conservation. "Air Pollution" and "Noise," printed pp. 61 to 62. **Land Use and Economic Prosperity**, Figure 2-1, printed p. 13 and pp. 16 to 25. Draft Ideas Report, August 2025, land use concept notes.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, sections 1, 5, 7 and recommendations 1, 2, 4, 5, 6; Fair Housing Review Chapter 6 and request 8.8.

Concentrate the highest designations where transit demand is measured to be strongest, and re-justify the Marketplace at the Grove and Federal at Euclid villages on the basis the data support.

> **Two of the plan's transit villages sit where transit demand is weakest and traffic heaviest. Marketplace at the Grove records 429 daily boardings and alightings against 44,400 vehicles a day, the lowest ratio in Mid-City.** Fairmount at University, the busiest transit location in the plan area at 3,458 on 15,900 vehicles, is designated corridor.

EVIDENCE: THE CITY'S OWN STOP COUNTS AGAINST ITS OWN TRAFFIC COUNTS

Location	Daily boardings and alightings	Daily traffic	Per 1,000 vehicles	Proposed role
Fairmount Ave and University Ave	**3,458**	15,900	**217.5**	Corridor, beside Mid-City Center
43rd St and El Cajon Blvd	1,653	19,500	84.8	Transit village, Mid-City Center
54th St and El Cajon Blvd	1,266	15,400	82.2	Transit corridor
College Ave and University Ave	1,425	25,200	56.5	Transit corridor
Euclid Ave and Federal Blvd	366	29,400	12.4	**Transit village**
College Ave and College Grove Dr	429	**44,400**	**9.7**	**Transit village**

Mobility Assessment Table 4.1 (273 stops, combined by intersection across routes and directions) and Table 6.7. The ratio across thirteen major locations spans twenty-two fold. The Assessment's own list of five "highest ridership" locations does not match its Table 4.1; this ranking is built from the table.

- **Mid-City Center, which the plan calls a community village, is sited correctly, and this comment says so plainly.** The plan places it along Fairmount Avenue, El Cajon Boulevard and University Avenue (printed p. 88), which takes in the two busiest transit locations in the plan area, Fairmount at University and 43rd at El Cajon; together they carry 5,111 daily boardings and alightings, nineteen percent of all transit activity in the study area.
- Marketplace at the Grove and Federal at Euclid are large sites in consolidated ownership, and planning a village at either for its redevelopment potential is sound planning. **The label is what the data do not support, and the label determines the design.** A village justified by transit belongs at its densest close to the street. A village justified by site availability on a roadway carrying 44,400 vehicles a day is the strongest candidate in Mid-City for setting homes back from the roadway edge (Finding 11).
- **On planned service.** The draft justifies the College Grove village by "high-quality transit, including the planned Rapid 256," and the Federal and Euclid village by bus rapid transit and "the potential for a future transit station as part of the planned Trolley Purple Line" (printed p. 89). It states no timing or funding for either, and the Mobility chapter says only that the Purple Line "is planned ... with two stations in Mid-City" (printed p. 123). The 429 and 366 figures are present-conditions measurements; the plan should say when, and on what funding, the service it relies on arrives.

IN THE DRAFT PLAN

Urban Design. Figure 5-5, Marketplace at the Grove Study Area, printed p. 93, and its text at p. 89; Figure 5-6, Federal Boulevard and Euclid Avenue Study Area, printed p. 94. **Mobility**, Figure 6-3, Planned Transit Network, printed p. 124.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, sections 3c and 4 and recommendation 3; Mobility Assessment Tables 4.1 and 6.7.

Reconcile Figure 2-1 with Figure 5-1, or restate the Transit Neighborhoods definition to match the designations actually applied. The land use map does not deliver the graduated pattern the urban design framework describes.

> **The Urban Design Framework defines Transit Neighborhoods as "a mix of neighborhood-friendly housing types and markets that provide a transition from transit villages, corridors, and main streets" (printed p. 82), and Figure 5-1's own legend calls them "lower-scale buildings and missing-middle housing types" (printed p. 83). Much of the ground Figure 5-1 labels that way carries Residential Medium-3 and Medium-4 on Figure 2-1, at 56 to 109 homes per acre, applied across whole blocks.** A uniform field at those densities is a transition from nothing to nothing.

EVIDENCE

The draft's own text at printed page 14 says the land use map "establishes a graduated pattern of development, transitioning from higher densities along urban and community villages and transit corridors to medium and lower densities within the surrounding neighborhoods." Figure 5-1, the Urban Design Framework, sets out the node-and-transition structure that sentence describes: Transit Villages concentrating the highest density around transit, Transit Corridors along main transit routes, Transit Neighborhoods stepping down behind them. Figure 2-1, Planned Land Uses, departs from it in three respects.

- **The highest designation is applied linearly, not at nodes.** Community Commercial at up to 218 homes per acre runs as a near-continuous ribbon along the full length of El Cajon Boulevard and University Avenue, while Figure 5-1 identifies a small number of villages.
- **Intensity does not decline with distance from the roadway.** Across Normal Heights south of Adams Avenue and through western City Heights, Medium-3 (56 to 73) and Medium-4 (74 to 109) are applied across whole blocks in a substantially uniform field. A parcel three blocks from El Cajon Boulevard carries broadly what a parcel facing it carries.
- **The two figures describe the same ground differently.** Much of that Medium-3 and Medium-4 area falls inside what Figure 5-1 labels Transit Neighborhoods.

THE TRANSITION FAILS IN TWO DIFFERENT WAYS IN THE TWO HALVES OF THE PLAN AREA

In western Mid-City the transition is absent because the medium-density field is continuous, several streets deep between El Cajon Boulevard and University Avenue. In eastern Mid-City it is absent because there is nothing between the corridor and the single-family blocks: along University Avenue near College Avenue and 60th Street, Community Commercial at up to 109 homes per acre abuts Residential Low-2 at 5 to 9 directly, with no intermediate designation. The same missing gradient produces uniform intensity in one half and an abrupt edge in the other. Neither is the transition Figure 5-1 describes.

These observations describe pattern, not parcels, and are taken from the published figures and the City's interactive land use map at the resolution released. This is not an argument against the densities; it is an argument that the plan's two figures should agree about where they go, and that the depth gradient in Finding 11 is the mechanism that would make them agree.

IN THE DRAFT PLAN

Urban Design. Figure 5-1, Urban Design Framework, printed p. 83, and the framework definitions at p. 82. **Land Use and Economic Prosperity**, Figure 2-1, Planned Land Uses, printed p. 13, with the designations at pp. 16 to 25, and "Transitions," printed p. 14.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, section 6 and recommendation 7.

Address the corridor conditions alongside the intensity decision. Mid-City recorded 316 pedestrian injury collisions in five years, concentrated on the corridors receiving the most new capacity, which also carry no low-stress bicycle route and the plan area's worst peak-hour intersections.

> **The City's Mobility Assessment records 316 pedestrian-involved injury collisions between 2018 and 2022, 16 of them fatal, concentrated on El Cajon Boulevard, University Avenue and Fairmount Avenue.** Four of the fatalities were at El Cajon intersections and four at University intersections. These are the corridors where Figure 2-1 places its highest residential designations.

EVIDENCE

Intersection	AM peak delay	AM	PM peak delay	PM	Automobile collisions 2018-22
College Ave and University Ave	96.2 sec	**F**	142.7 sec	**F**	not top eight
Home Ave and Fairmount Ave	112.4 sec	**F**	76.6 sec	E	18
Euclid Ave and University Ave	56.6 sec	E	56.4 sec	E	not top eight
Fairmount Ave and El Cajon Blvd	56.0 sec	E	31.4 sec	C	**29, highest in Mid-City**
Fairmount Ave and Aldine Dr	13.2 sec	B	118.7 sec	**F**	
54th St and University Ave	24.7 sec	C	31.8 sec	C	16
Fairmount Ave and University Ave	42.1 sec	D	40.7 sec	D	15

Mobility Assessment Tables 6.9, 6.3 and 4.1. Twelve study intersections operate at level of service E or F in a peak; six are freeway ramps on I-805 and I-15. Level of service is reported here as a livability and transit-reliability measure; it is not the basis for the exposure findings, which rest on daily volume.

- **College Avenue at University Avenue fails in both peaks** and lies on a corridor the plan treats as suitable for its highest intensities. Fairmount at University, the busiest transit location in Mid-City, does not appear among the substandard intersections: the place with the strongest transit demand is not the place with the worst congestion.
- **El Cajon Boulevard at Fairmount is the most frequent automobile collision location in Mid-City** at 29, on a comparatively modest 9,400 vehicles a day, which points to a design condition rather than a volume condition.
- The Assessment finds every major corridor in Mid-City at bicycle level of traffic stress 3 or 4 in its entirety, University Avenue primarily 4, and **no low-stress route spanning the community in either direction.** Transit runs in the same lanes as general traffic on the corridors with the highest passenger activity.
- **The City's own Mobility Board made an overlapping case independently** in its comment letter of 19 August 2026: safety as the top priority of a detailed implementation program, a ranked project list, and infrastructure investment tied to planned growth. This comment aligns with that letter and adds the placement question in Findings 11 and 12.

IN THE DRAFT PLAN

Mobility. Figure 6-1, Planned Pedestrian Network, printed p. 120; Figure 6-2, Planned Bicycle Network, printed p. 122; Figure 6-4, Recommended Street Classifications, printed p. 127.
Implementation, Chapter 8.

SUPPORTING ANALYSIS

Mid-City Corridors Supplemental Analysis, sections 2, 3, 3b and 3c, recommendation 8; City of San Diego Mobility Board letter, 19 August 2026.

Publish engagement participation by community planning area, and return before the second draft to the communities the process did not reach, at times and in languages that work for people with long or irregular hours.

> **The draft reports that "more than 3,000 people (as of June 2026) provided over 10,000 comments through 108 events and 2 online surveys." That is a meaningful level of participation and this comment says so. None of it is published by community, so whether all four communities were proportionately represented cannot be determined from the record.**

EVIDENCE

The Introduction lists the engagement by format: 5 community forums, 7 workshops, 7 Working Group meetings, 11 office hours, 11 community interviews, 17 community planning group meetings, 17 pop-up stations, 27 youth engagement sessions and 6 focus groups, the last marked upcoming. It does not list it by place. For a plan that treats four communities as one Mid-City, that omission matters, because the four are not equally able to show up.

15.7%	74th	0 of 7	-76.6%
City Heights crowding rate, against 5.8 percent citywide; the highest in the plan area	City Heights CalEnviroScreen percentile statewide; the plan area's highest environmental burden	Eastern Area tracts with a State change designation, while its composition shifted 26 and 42 percent	Normal Heights Black non-Hispanic population since 2000, on all four tracts designated

- **Low participation from City Heights would not indicate low stake.** It is the plan area's most crowded community, carries its highest environmental burden, and its residents are the least able to give a weekday evening to a document about the next thirty years. A process that reads quiet as agreement will systematically underweight the community with the most at risk.
- Normal Heights and Eastern Area both carry conditions that raise the stakes of being heard: Normal Heights for its Black population decline and complete designation coverage, Eastern Area for a compositional shift the State's instruments do not register (Finding 7).
- If the engagement record cannot establish proportionate representation, the second-draft process should include targeted outreach to each of the four planning groups, scheduled outside weekday evenings, located inside each community, and translated.

ANSWER COMMUNITY BY COMMUNITY

The draft's fair housing and anti-displacement content speaks of Mid-City as one place. This comment asks that the City's response to it, and the second draft's own fair housing analysis, state which of the conditions documented here it accounts for and which it does not, in four separate answers rather than a single plan-area narrative. The four communities share a boundary. They do not share a story.

IN THE DRAFT PLAN

Introduction. "Community Engagement," printed pp. 10 to 11.
Implementation, Chapter 8, for the second-draft process.

SUPPORTING ANALYSIS

Mid-City Communities Fair Housing Review, Chapter 7 and requests 8.9 and 8.10; Chapter 9, question 6.

Mid-City Corridors: Traffic Exposure, Transit Demand and Residential Intensity

Supplemental analysis to the Mid-City Communities Fair Housing Review

Prepared by San Diego Fair Housing Lab
Date September 2026

Contents

0. Front Matter 3
Summary 3
1. Peak segment volumes on the fourteen roadways examined range from 4,400 to 44,400 vehicles a day 4
2. The corridors with the worst congestion are not the ones carrying the most traffic 5
3. Pedestrian injuries concentrate on the corridors receiving the most new capacity 5
3b. Twelve intersections already operate at substandard levels during peak periods 6
3c. Traffic, transit, collisions and proposed intensity at eight locations 6
4. Transit demand and traffic volume vary independently 7
5. The City committed to assessing air and noise pollution alongside this density 9
6. The land use map does not implement the urban design framework 9
7. Three corridor categories 10
8. Recommendations 11
9. What this analysis does not claim 11
Appendix. Sources and methods 12
Sources 14

0. Front Matter

> **About this document.** This is supplemental analysis to the **Mid-City Communities Fair Housing Review**, published with it as part of the San Diego Fair Housing Lab's public comment on the first draft Mid-City Communities Plan Update, September 2026. Figures are the City's own unless stated otherwise.

Relationship to the main review. The Mid-City Communities Fair Housing Review evaluates the first draft Mid-City Communities Plan Update against the fair housing duty the plan invokes. **This document addresses one question that review raises and does not resolve: whether the draft plan's placement of residential intensity corresponds to the measured conditions of the corridors it is placed on.** The review summarises the findings below in its chapter on environmental justice and housing; the full analysis is here.

Why it is kept separate. The transportation argument is substantial enough to eclipse the fair housing one if the two are combined. Holding them apart lets each be read, and disputed, on its own evidence.

Sources. City of San Diego Draft Existing Conditions Mobility Assessment and its appendices; the Draft Ideas Report of August 2025; the Corridor Concept Analysis of February 2026; and Figures 2-1 and 5-1 of the first draft Mid-City Communities Plan. Full sourcing and method in the appendix.

A note on what this is. The analysis establishes that traffic volume and distance from the roadway are recognised exposure considerations, and that the City's own data show enough variation among its designated corridors to warrant a differentiated land use response. **It measures no pollutant concentration, and estimates no health outcome at any location.** Section 9 states the limits directly.

Summary

The draft plan directs new housing to the corridors it designates on its land use map and treats them as a single development category. The City's own traffic data show that they are not one category. Peak segment volumes on the fourteen roadways examined in section 1 range from **4,400 vehicles a day on Chollas Parkway to 44,400 on College Avenue**, a tenfold difference, and transit demand varies independently of it.

The two study areas the plan itself calls transit villages, Marketplace at the Grove and Federal Boulevard at Euclid Avenue, are located where transit demand is lowest, and one of them on the segment carrying the most traffic in Mid-City. The plan's land use map does not deliver the graduated pattern its own urban design framework describes. And in August 2025 the City committed to assessing air and noise pollution alongside the additional density it has now proposed; that assessment does not appear in the draft.

None of this is an argument against growth near transit. It is an argument that the placement of intensity should follow the measured conditions of each corridor rather than a single designation applied to all of them.

The analytical framework is the U.S. Environmental Protection Agency's, and the planning recommendation is the California Air Resources Board's. EPA's EJSCREEN methodology treats traffic proximity as average annual daily traffic within a 500-meter radius divided by distance, weighting closer traffic more heavily. CARB's 2017 technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways*, was written for planners facing precisely this tension: it recognizes that infill development near transit produces substantial public health benefits while people living near high-volume roadways can experience increased exposure to traffic pollution, air toxics and noise.

1. Peak segment volumes on the fourteen roadways examined range from 4,400 to 44,400 vehicles a day

Existing average daily traffic, from Table 6.7 and Figure 5.3 of the Mobility Assessment. Table 6.7 tabulates 117 segments on 24 study roadways (117 is the count of its rows; the Assessment's own summary sentence says 116). The fourteen below are the eleven on which the plan's Urban Design Framework places a transit village, transit corridor, study area or main street (printed pages 88 to 104: El Cajon Boulevard, University Avenue, Euclid Avenue, Fairmount Avenue, Home Avenue, Federal Boulevard, Adams Avenue, College Avenue, College Grove Drive, 54th Street and Chollas Parkway), and three this analysis discusses on their own evidence: Aldine Drive, whose one segment operates at level of service F on a two-lane collector; 43rd Street, which Figure 5-1 places inside the Mid-City Center village and which holds Mid-City's second-busiest transit location; and Orange Avenue, which runs through the area between El Cajon Boulevard and University Avenue named in the City's August 2025 commitment (section 5). The ten study roadways omitted are collectors and connectors carrying 1,100 to 13,070 vehicles a day (35th, 47th, 52nd and A Streets, Landis Street, Marlborough Avenue, Monroe Avenue, Streamview Drive, Wightman Street and Winona Avenue) on which the plan places none of those roles. The plan draws its corridor designations on Figure 2-1 rather than listing them in its text, so no count of designated corridors is used:

Roadway	Segments	Daily traffic	Peak segment
College Avenue	4	25,200 to **44,400**	College Grove Dr to Federal Bl
Euclid Avenue	10	6,300 to **34,400**	54th St to SR-94
Home Avenue	4	17,300 to **32,400**	
University Avenue	20	11,000 to **29,100**	Chollas Pkwy to 58th St
El Cajon Boulevard	8	14,600 to 21,800	
Aldine Drive	1	20,300	
Fairmount Avenue	11	4,700 to 18,900	
54th Street	5	15,400 to 17,200	
Adams Avenue	4	5,800 to 15,800	
College Grove Drive	2	11,300 to 14,000	
Federal Boulevard	2	5,400 to 9,400	
43rd Street	5	5,100 to 7,700	

Roadway	Segments	Daily traffic	Peak segment
Orange Avenue	8	2,400 to 6,800	
Chollas Parkway	1	4,400	

Several corridors vary as much within themselves as they do from one another. Fairmount Avenue runs from 4,700 to 18,900 vehicles per day along its own length, a fourfold difference under a single street name, and Euclid Avenue from 6,300 to 34,400. A designation applied corridor-wide cannot be correct at both ends.

2. The corridors with the worst congestion are not the ones carrying the most traffic

El Cajon Boulevard carries between 14,600 and 21,800 vehicles per day, and none of its eight study segments operates below an acceptable level of service, because it has the lane capacity to absorb them. University Avenue reaches level of service E or F on most of its segments while carrying less traffic, because much of it is a two or three lane collector. One University segment, Highland Avenue to 47th Street, operates at a volume-to-capacity ratio of 2.000 while carrying 16,000 vehicles per day.

Congestion and volume are therefore separate measures in Mid-City, and they rank the corridors differently. Exposure to traffic emissions is a function of how many vehicles pass a location and how far away they are, not of whether those vehicles are queuing. Congestion remains a legitimate concern for livability and for transit reliability, and it is treated as such in section 3. It is not the basis for the siting recommendations in this document.

3. Pedestrian injuries concentrate on the corridors receiving the most new capacity

The Mobility Assessment reports **316 pedestrian-involved collisions resulting in injury between 2018 and 2022**, of which **16 resulted in a fatality**. The corridors with the most pedestrian-involved collisions were **El Cajon Boulevard, University Avenue, and Fairmount Avenue**. Of the 16 fatal collisions, four occurred at intersections along El Cajon Boulevard and four along University Avenue.

On bicycle conditions, the assessment finds that all the major corridors in Mid-City are level of traffic stress 3 or 4 in their entirety, including El Cajon Boulevard, Fairmount Avenue, College Avenue, Euclid Avenue, Federal Boulevard, 54th Street and College Grove Drive, with University Avenue primarily level 4. It concludes that there are currently no low-stress routes spanning the community in either direction.

Transit operates in the same conditions. The assessment notes that transit in Mid-City “operates along the same roadway segments as passenger vehicles and is therefore influenced by the same congestion,” naming Adams Avenue, El Cajon Boulevard, Euclid Avenue, Fairmount Avenue, Home Avenue, University Avenue and Wightman Street, and observing that this affects “areas with some of the highest transit passenger activity.”

3b. Twelve intersections already operate at substandard levels during peak periods

Daily volume is the measure relevant to exposure and is the basis for the siting recommendations in this document. Peak-hour performance describes something different and worth stating separately: how the corridor functions at the times most residents experience it.

Table 6.9 of the Mobility Assessment identifies twelve study intersections operating at level of service E or F in the AM or PM peak. Those on the corridors carrying the most new capacity:

Intersection	AM delay	AM	PM delay	PM
College Avenue & University Avenue	96.2 sec	**F**	142.7 sec	**F**
Home Avenue & Fairmount Avenue	112.4 sec	**F**	76.6 sec	E
Euclid Avenue & University Avenue	56.6 sec	E	56.4 sec	E
Fairmount Avenue & El Cajon Boulevard	56.0 sec	E	31.4 sec	C
Fairmount Avenue & Aldine Drive	13.2 sec	B	118.7 sec	**F**
54th Street & Chollas Parkway	26.2 sec	D	36.2 sec	E

The remaining six are freeway ramp intersections on I-805, I-15 and University Avenue, the worst being I-805 northbound ramps at University Avenue at 129.2 and 151.9 seconds of delay.

College Avenue at University Avenue fails in both peaks, and it lies on a corridor the plan treats as suitable for its highest intensities. **Fairmount Avenue at University Avenue does not appear among the substandard intersections**, despite being the busiest transit location in Mid-City. The place with the strongest transit demand is not the place with the worst peak congestion.

3c. Traffic, transit, collisions and proposed intensity at eight locations

The eight locations below were selected using the City's own criteria rather than by which best supported a conclusion: identified level of service E or F, inclusion among the most frequent collision locations, high daily traffic volume, major transit activity, or designation as a transit village.

Location	Daily traffic	Transit b+a	Collisions 2018-22	AM peak	PM peak	Proposed role
Fairmount Ave & University Ave	15,900	**3,458**	15	42.1 D	40.7 D	Corridor, beside Mid-City Center community village
College Ave & University Ave	25,200	1,425	not top eight	**96.2 F**	**142.7 F**	Transit corridor
54th St & University Ave	21,600	1,345	16	24.7 C	31.8 C	Transit corridor
El Cajon Blvd & Fairmount Ave	9,400	623	**29, highest in Mid-City**	56.0 E	31.4 C	Transit corridor
College Ave & College Grove Dr	**44,400**	429	12	40.4 D	37.7 D	**Transit village**
Euclid Ave & Federal Blvd	29,400	366	not top eight	24.0 C	24.7 C	**Transit village**
Home Ave & Fairmount Ave	32,400	281	18	**112.4 F**	76.6 E	Study area 11
Euclid Ave & University Ave	20,300	none recorded	not top eight	56.6 E	56.4 E	Transit corridor

Read across the rows rather than down the columns, the four measures do not agree with one another at any location, and the plan's assignment of role does not track any of them consistently.

At College Avenue and University Avenue the Assessment gives two segment volumes: 25,200 on College Avenue between El Cajon Boulevard and University Avenue, and 22,100 on University Avenue between 60th Street and College Avenue. Both tables in this analysis use the College Avenue figure.

Fairmount Avenue at University Avenue carries the most transit activity in Mid-City, on the second lowest traffic volume in this table, at acceptable peak delay. On every measure it is the strongest candidate for concentrated residential intensity, and it is designated corridor rather than village.

College Avenue at College Grove Drive carries the highest traffic volume in the plan area, 429 daily boardings and alightings, and twelve collisions, and it is designated a transit village.

El Cajon Boulevard at Fairmount Avenue is the most frequent automobile collision location in Mid-City at 29 collisions, on a comparatively modest 9,400 vehicles per day, which indicates a design condition rather than a volume condition.

Euclid Avenue at University Avenue operates at level of service E in both peaks and has no transit stop recorded in Table 4.1.

4. Transit demand and traffic volume vary independently

Table 4.1 of the Mobility Assessment records boardings and alightings at 273 transit stops, which combine to 166 distinct locations and 27,083 daily boardings and alightings across the study area. Setting transit demand against traffic volume at the same locations tests the plan's own rationale directly.

The ratio below is daily boardings and alightings per 1,000 vehicles. A high ratio indicates a location whose activity comes from transit; a low ratio indicates a location where the traffic is passing through.

Location	Daily boardings + alightings	Daily traffic	Ratio
Fairmount Ave & University Ave	**3,458**	15,900	**217.5**
43rd St & El Cajon Blvd	1,653	19,500	84.8
54th St & El Cajon Blvd	1,266	15,400	82.2
El Cajon Blvd & Fairmount Ave	623	9,400	66.3
54th St & University Ave	1,345	21,600	62.3
College Ave & University Ave	1,425	25,200	56.5
El Cajon Blvd & Winona Ave	828	17,500	47.3
College Ave & El Cajon Blvd	1,222	27,289	44.8
I-15 Transit Plaza & University Ave	1,012	25,100	40.3
35th St & El Cajon Blvd	554	21,800	25.4
Euclid Ave & Federal Blvd	366	29,400	12.4
58th St & University Ave	330	29,100	11.3
College Ave & College Grove Dr	429	**44,400**	**9.7**

The ratio spans twenty-two fold. Corridor designation alone does not indicate where transit demand is concentrated.

The two study areas the plan calls transit villages are sited where transit demand is lowest

Study area 4, Marketplace at the Grove, is College Avenue at College Grove Drive: **429 daily boardings and alightings against 44,400 vehicles per day**, the lowest ratio among the thirteen locations tabulated above. Study area 5, Federal Boulevard at Euclid Avenue, is the second lowest, at 366 against 29,400.

The plan groups five study areas under the heading Transit Villages at printed pages 88 and 89, and its text calls only these two a “transit village”. Mid-City Center and Mid-City West are each a “community village” and Chollas Triangle is a “study area”, so the count of villages used here is two, the plan’s own. The plan justifies the Federal and Euclid village by bus rapid transit and “the potential for a future transit station as part of the planned Trolley Purple Line” (printed page 89), and Mid-City Center in the same words (printed page 88). The Mobility chapter says only that the Purple Line is planned with two stations in Mid-City (printed page 123). No timing or funding is stated for either station, and the figures in this section describe present conditions.

Study area 1, Mid-City Center, is sited correctly and this should be said plainly. The plan places it along Fairmount Avenue, El Cajon Boulevard and University Avenue (printed page 88), and on Figure 5-1 its Transit Villages fill runs along 43rd Street from El Cajon Boulevard to University Avenue. The busiest and second busiest transit locations in Mid-City, Fairmount Avenue at University Avenue and 43rd Street at El Cajon Boulevard, sit beside and inside it, together carrying **5,111 daily boardings and alightings**, nineteen percent of all transit activity in the study area.

Both Marketplace at the Grove and Federal at Euclid are large sites in consolidated ownership, and siting a village at either one for its redevelopment potential is sound planning. The plan describes them as transit villages, however, and the transit data do not support that description. **The distinction**

determines the appropriate design response. A village justified by transit access belongs at its densest close to the street. A village justified by site availability, on a roadway carrying 44,400 vehicles per day with little transit ridership, is the strongest candidate in Mid-City for setting residential intensity back from the roadway edge.

5. The City committed to assessing air and noise pollution alongside this density

The Draft Ideas Report of August 2025 carries the following note beneath its land use concept maps, repeated across the concepts:

> "Additional density will be studied between El Cajon Blvd and University Ave and along the SR-15 rapid bus corridor while assessing considerations related to fair housing, **air and noise pollution**, and feasibility testing."

The August 2026 draft plan applies that additional density. Its Chapter 4, Sustainability, Equity, Resilience and Conservation, addresses roadway air pollution in three places, and its Chapter 5, Urban Design, in one more. Policy 4.10 encourages new residential buildings within 500 feet of a freeway to incorporate building features that reduce the effects of air pollution (printed page 78), and Chapter 5's Design Adjacent to Freeways guidance at printed page 85 describes a layered buffering strategy within 500 feet of a freeway; both are specific to freeways. Policy 4.11 supports strategies to mitigate air pollution sources from on-road transportation near sensitive receptors (printed page 78); it carries no freeway qualifier, and it is a statement of support with no standard behind it. The chapter's Air Pollution passage at printed pages 61 and 62 observes that Mid-City communities "are closely situated to high-traffic corridors", adds one sentence linking freeway pollution to the community's asthma burden, and goes no further. For the arterial corridors that receive the plan's new residential intensity, the draft therefore contains no analysis of exposure by residents living beside the roadway, no ventilation or filtration standard, and no health risk assessment.

The geography named in that commitment, between El Cajon Boulevard and University Avenue and along the SR-15 corridor, is the same area identified in section 6 below as receiving uniform medium-density designations across whole blocks.

6. The land use map does not implement the urban design framework

Figure 5-1, the Urban Design Framework, at printed page 83 of the draft plan, sets out a node and transition structure, and its legend defines the categories. **Transit Villages**: "A mix of uses concentrating commercial, office and the highest density around transit." **Transit Corridors**: "A mix of uses and density oriented along main transit corridors." **Transit Neighborhoods**: "Lower-scale buildings and missing-middle housing types that provide a transition from transit corridors and transit villages." The body text at printed page 82 defines the same categories in other words, and for Transit

Neighborhoods reads: "A mix of neighborhood-friendly housing types and markets that provide a transition from transit villages, corridors, and main streets." Both are the plan's own definitions; the legend is the one printed on the figure itself.

Figure 2-1, Planned Land Uses, at printed page 13 with its designation legend from page 16, applies designations that do not follow that structure in three respects.

The highest designation is applied linearly rather than at nodes. Community Commercial at up to 218 dwelling units per acre (the legend range is 0 to 218) runs as a near-continuous ribbon along the full length of El Cajon Boulevard and University Avenue, while Figure 5-1 identifies only a small number of transit villages.

Intensity does not decline with distance from the roadway. Across Normal Heights south of Adams Avenue and through western City Heights, Residential Medium-3 at 56 to 73 units per acre and Medium-4 at 74 to 109 units per acre are applied across whole blocks in a substantially uniform field.

The two figures describe the same ground differently. Much of that Medium-3 and Medium-4 area falls within what Figure 5-1 labels Transit Neighborhoods, the category the figure's legend defines as lower-scale, missing-middle housing. Densities of 56 to 109 units per acre are neither.

The transition fails in two different ways in two halves of the plan area

Parcel-level review of the City's interactive land use map confirms the pattern and shows that it takes opposite forms east and west.

In western Mid-City the transition is absent because the medium-density field is continuous. Between El Cajon Boulevard and University Avenue, across Normal Heights and City Heights, Residential Medium-3 and Medium-4 are applied to whole blocks running several streets deep, with Community Commercial frontage on the arterials and Urban Village designations at intervals. A parcel three blocks from El Cajon Boulevard carries broadly what a parcel facing it carries.

In eastern Mid-City the transition is absent because there is nothing between the corridor and the single-family blocks. Along University Avenue near College Avenue and 60th Street, Community Commercial at up to 109 dwelling units per acre forms a narrow linear band abutting Residential Low-2 at 5 to 9 units per acre directly, with no intermediate designation on either side.

The same absence of a graduated pattern therefore produces uniform intensity in one half of the plan area and an abrupt edge in the other. **Neither is the transition Figure 5-1 describes.**

The draft does not publish residential capacity by community planning area, making it difficult to evaluate whether the proposed distribution of growth is proportionate among the four communities.

7. Three corridor categories

Proposed as a framework for differentiated treatment, ordered by peak segment volume.

Category A. Concentrate intensity at nodes and step it back from the roadway edge. College Avenue (44,400), Euclid Avenue (34,400), Home Avenue (32,400), University Avenue (29,100).

Category B. Differentiate by segment rather than corridor-wide. El Cajon Boulevard (14,600 to 21,800), Fairmount Avenue (4,700 to 18,900), Adams Avenue and Aldine Drive (5,800 to 20,300), 54th Street (15,400 to 17,200).

Category C. Roadway exposure is not the governing consideration. Chollas Parkway (4,400), Orange Avenue (2,400 to 6,800), 43rd Street (5,100 to 7,700), Federal Boulevard (5,400 to 9,400), College Grove Drive (11,300 to 14,000).

Category C matters as much as Category A. An analysis that makes the same claim about every corridor is properly read as a general objection to density. Naming the corridors where the concern does not apply is what makes it credible on the corridors where it does.

8. Recommendations

1. **Complete the air and noise assessment the City has already committed to**, for the geography named in the August 2025 Ideas Report, before the highest-density designations are finalized.
2. **Differentiate residential intensity by measured roadway volume**, using Table 6.7, rather than applying one transit-corridor treatment across a tenfold range of conditions, and calibrate the gradient to volume rather than to a fixed number of parcels.
3. **Concentrate the highest designations where transit demand is measured to be strongest**, using Table 4.1, and reconsider or re-justify the villages at College Avenue and College Grove Drive and at Federal Boulevard and Euclid Avenue.
4. **Establish a depth gradient behind the highest-volume segments**, with the highest medium designations facing the corridor and lower designations behind.
5. **Use the roadway edge on Category A corridors for active commercial and mixed-use frontage** rather than continuous residential frontage.
6. **Require filtration, protected air intakes and ventilation measures** for residential buildings within identified near-roadway zones, consistent with the California Air Resources Board's 2017 technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways*.
7. **Reconcile Figure 2-1 with Figure 5-1**, or restate the Transit Neighborhoods definition to match the designations applied.
8. **Address the corridor conditions alongside the intensity decision**, given that Mid-City's 316 pedestrian injury collisions concentrate on the corridors receiving the most capacity and no low-stress bicycle route spanning the community.

9. What this analysis does not claim

No quantified exposure level or health risk category is asserted. This analysis establishes that traffic volume and distance from the roadway are recognized exposure considerations, and that the City's own data show sufficient variation among its designated corridors to warrant a differentiated land use response. It does not measure concentrations or estimate health outcomes at any location.

Level of service is not used as the basis for any recommendation. Level of service measures a roadway's performance against its own capacity, not the volume of traffic passing a given address. Because University Avenue is largely a two or three lane collector, it registers poor levels of service at volumes lower than those El Cajon Boulevard carries comfortably on more lanes. An argument built on level of service would therefore exempt El Cajon Boulevard, which carries more traffic than University Avenue on most segments and ties it for the most fatal pedestrian collisions in Mid-City, four each. Congestion is a real concern and is reported in section 3; it is not the measure that governs exposure.

The ridership ranking in section 4 is derived, not quoted, and the City's own document is internally inconsistent on this point. The Mobility Assessment states the matter twice and differently. Its transit chapter lists five locations as having "the highest ridership volumes": Fairmount Avenue and University Avenue, Euclid Avenue and University Avenue, 54th Street and University Avenue, College Avenue and University Avenue, and Fairmount Avenue and El Cajon Boulevard. Its Section 4 narrative instead names two, Fairmount Avenue and University Avenue with 3,458 daily boardings and alightings, and El Cajon Boulevard and 43rd Street with 1,653.

Aggregating Table 4.1 supports the second passage and not the first. By that table, El Cajon Boulevard and 43rd Street is the second busiest location in Mid-City and does not appear in the list of five. Fairmount Avenue and El Cajon Boulevard, which does appear, carries 623, well below both. **And Euclid Avenue and University Avenue, also on the list of five, has no transit stop recorded in Table 4.1 at all.**

This matters beyond bookkeeping. The list of five is the passage a reader is most likely to rely on for where transit demand is concentrated, and it omits the location where the plan has placed its Mid-City Center community village. The ranking used in section 4 is assembled from Table 4.1's stop-level rows, combining all directions and routes serving one intersection, and is described that way throughout.

Land use map readings describe pattern, not parcels. The observations in section 6 are taken from the published Figures 2-1 and 5-1 at the resolution at which they were released. Parcel-level questions should be confirmed against the City's interactive land use map.

Appendix. Sources and methods

How the different measures are used

The analysis draws on three kinds of traffic evidence and uses each for one purpose only.

Daily traffic volume is the primary evidence for the near-roadway exposure argument. The question is the relationship between the volume of traffic on a roadway and the proximity of housing to it, and the 24-hour volume is the appropriate measure of that. All corridor comparisons and the Category A, B and C assignments rest on it.

Peak-hour turning movements are contextual evidence about corridor functioning. They describe the concentration and directionality of activity at particular intersections. They are not required to establish the exposure gradient and are not used to do so.

Level of service and delay are the City's own operational analysis. Those are derived analytical measures, and this report cites the City's published results rather than attempting to reproduce the underlying model.

Keeping these separate matters because congestion and exposure are different conditions that rank the corridors differently, as section 2 sets out.

Traffic volumes. Table 6.7, Existing Roadway Level of Service of Study Segments, and Figure 5.3, Daily Traffic Volumes for Study Roadway Segments, in the Draft Existing Conditions Mobility Assessment (CR Associates, 2024). Table 6.7 carries 117 study segment records on 24 roadways, spanning 1,100 to 44,400 vehicles per day; **the table in section 1 carries the 85 segments on the fourteen roadways selected by the rule stated there**, and every volume in this analysis is drawn from those rows. Values were cross-checked against Figure 5.3 and against the existing-conditions diagrams in the Corridor Concept Analysis, which reproduce the same figures independently, giving three levels of source agreement: the underlying counts in Appendix C, the summary in Table 6.7 and Figure 5.3, and the corridor diagrams.

Transit demand. Table 4.1, Average Daily Boardings and Alightings by Transit Stop (2023), source MTS, in the same assessment, pages 66 through 73. Two hundred seventy-three stop records were combined into 166 locations by aggregating all directions and routes serving the same intersection. The two busiest locations so derived reproduce the figures stated in the assessment's own narrative.

Collision data. Table 6.3, Most Frequent Automobile Collision Locations, and sections 2 and 3 of the same assessment, all covering 2018 through 2022, source TIMS (2024).

Peak-hour intersection performance. Table 6.9, Existing Peak Hour Study Intersection Analysis. Eighty-three intersections were recovered; the twelve identified in the assessment's narrative as operating at level of service E or F each reconcile to the table, including which peak they fail in. **One further intersection, 33rd Street and Orange Avenue, records 216.0 seconds of AM delay at level of service F in the table and does not appear in the narrative list of twelve.** That discrepancy has not been resolved and the figure is not relied on here.

Land use designations. Figure 2-1, Planned Land Uses, and Figure 5-1, Urban Design Framework, Draft Mid-City Communities Plan, August 2026.

The air and noise commitment. Draft Ideas Report, August 2025, note beneath the land use concept maps.

Corridor design vocabulary. The Corridor Concept Analysis is organized by named segment and specifies roadway elements including median type, travel lanes, bike route, on-street parking, sidewalk width, and sidewalk treatments with tree grate or landscape buffers. Recommendation 5 uses that vocabulary rather than proposing a new standard.

How the counts were taken. Per Appendix A of the Mobility Assessment: "Ground truth roadway segment counts were collected using tubes during a typical weekday over a 24-hour period. Intersection turning movement counts were collected using video counters" during a typical weekday, "during the morning peak period (7:00 AM to 9:00 AM) and evening peak period (4:00 PM to 6:00 PM)." Counts were "staggered over several weeks" owing to weather, street sweeping and construction, and "all existing traffic counts were conducted between March and April 2024, by Counts Unlimited, Inc. and Elite Traffic Dynamics, LLC."

Count-date note. Appendix A states that existing traffic counts were conducted between March and April 2024. Appendix C contains 32 dated records from September 5, 2024, as well as historical City counts from 2015 through 2023. The September records were verified as genuine intersection turning-movement counts rather than extraction errors. They do not affect the roadway-segment ranges reported from Table 6.7.

What "existing conditions" means here. Of 282 dated records in Appendix C, 236 carry a single date, Wednesday, March 13, 2024. That concentration does not invalidate any figure, and it is worth knowing whenever peak-period observations are discussed: the peak-hour picture in this record is largely one Wednesday in March. A claim about an individual segment or intersection should cite the count sheet rather than the summary table.

The literature review, and what it does not contain. Appendix B reviews the City's adopted plans and policies. It contains no discussion of near-roadway pollution exposure, no reference to sensitive receptors, and no mention of particulate matter, diesel emissions or asthma. Its air quality references run the other direction, toward emissions reduction: the Climate Action Plan's Measure 3.4, "Reduce Traffic Congestion to Improve Air Quality," and a Green Streets discussion of walking and cycling "helping to reduce air pollution" and "contributing to improved public health."

It does record one relevant acknowledgment. Summarising the adopted Mid-City community plans, Appendix B notes that "the construction of SR-15 has presented problems to address, such as noise, visual impact, and traffic circulation." The City's own adopted plans therefore recognize that a high-volume facility imposes burdens on the neighborhoods beside it. That acknowledgment concerns noise and visual impact rather than air quality, and it concerns a freeway rather than the arterials this analysis addresses, but it establishes that corridor burden on adjacent residents is not a novel consideration in Mid-City planning.

Not used. The Corridor Concept Analysis contains no discussion of air quality or exposure; its buffer references are to sidewalk landscaping.

Sources

- Draft Existing Conditions Mobility Assessment, City of San Diego, CR Associates (2024), and its appendices.
- Draft Mid-City Communities Plan, August 2026, 159 pages. Figure 2-1, Planned Land Uses, at printed page 13 with its designation legend from page 16; Figure 5-1, Urban Design Framework, at printed page 83, with the legend definitions quoted in section 6. Printed page numbers run four behind the PDF page numbers. Also the City's interactive land use map for the plan's first draft.
- Draft Ideas Report, August 2025.
- Corridor Concept Analysis, February 2026.
- U.S. Environmental Protection Agency, EJSCREEN technical documentation, traffic proximity indicator.
- California Air Resources Board, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways*, Technical Advisory, April 2017. https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

City Heights Community Fair Housing Report

Appendix 1 to the Mid-City Communities Fair Housing Review

Prepared by San Diego Fair Housing Lab
Date September 2026
Mid-City Communities Plan Update, September 2026

Contents

About this report 3

1. Narrative 4

2. Population (2000 → Current) 7

3. Population by Race Breakdown 8

4a. Housing Units & Households (2000 → Current) 9

4b. Housing Production (6th RHNA Cycle) 10

5a. Households by Race x Tenure (2000 → Current) 12

5b. Mobility 14

6. Crowding 15

7. Age Composition (2000 → Current) 16

8a. Economic Trend (Population-Weighted Medians) 17

8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change) 18

8c. Naturally Occurring Affordable Housing 19

9. Supplementary Context 22

10. Climate Equity 24

11. Sources and Methods 25

12. Tract-Level Detail 27

Terms used in this document 28

About this report

Mid-City Communities Plan Update. Community planning area: Mid-City:City Heights. Appendix 1 to the Mid-City Communities Fair Housing Review. San Diego Fair Housing Lab, 2026.

> **How to read the City of San Diego columns.** Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced.
>
> **How to read the comparison columns.** This community's 15 census tracts are split 14 in Council District 9 (93.33 percent) and 1 in Council District 4 (6.67 percent). The District 4 share is a single tract and is treated as negligible, so the report compares the community with District 9 and with the city. The community column includes all 15 tracts; the District 9 column is the whole district, not only this community's part of it.

This report covers demographic, housing and economic change from 2000 to the current period (American Community Survey 2020-2024) for one of the four communities in the Mid-City Communities Plan Update, with companion reports for Eastern Area, Kensington-Talmadge and Normal Heights. Sources and methods are set out in Section 11.

1. Narrative

This report examines demographic, housing, and economic change in the Mid-City:City Heights community planning area from 2000 to the current period, comparing the CPA against both District 9 and the citywide baseline. It draws on U.S. Census Bureau data (2000 Decennial Census and American Community Survey estimates) alongside California HCD's Neighborhood Change and Opportunity Map methodologies. Mid-City:City Heights is a 15-tract community that lost 8.0 percent of its population over a period when the city grew, and every one of its 15 tracts sits in HCD's Low Resource opportunity tier. The distinctive feature of this CPA's record is that its severity indicators run well past both benchmarks on crowding, environmental burden, opportunity tier, and age composition, while the HCD measure built specifically to detect neighborhood change flags this CPA less often than it flags District 9 as a whole.

Key Findings

a) Mid-City:City Heights lost population during a period when District 9 declined only slightly and the city grew. Total population fell 8.0 percent, from 83,084 to 76,398, against a 1.7 percent decline district-wide and 14.1 percent growth citywide (Section 2). The CPA's population of color fell 10.7 percent, from 72,363 to 64,607, while the city's population of color grew 32.2 percent over the same period.

b) White NH is the only race category in this CPA to grow since 2000, and every other category declined, including the CPA's largest group. White NH population rose 10.0 percent, from 10,721 to 11,791, while Hispanic or Latino population, the largest group in this CPA at both endpoints, fell 7.6 percent, from 42,902 to 39,623 (Section 3). District 9's Hispanic or Latino population moved the opposite direction over the same period, growing 7.0 percent. Black NH population fell 25.5 percent here, from 11,945 to 8,902, a steeper rate than the city's 22.4 percent decline and a slightly slower one than District 9's 26.6 percent.

c) Crowding in this CPA eased more in absolute terms than in either comparison geography and still ends higher than both. The share of crowded households fell 26.4 percentage points, from 42.1 percent to 15.7 percent, against a 16.9-point drop district-wide and a 6.8-point drop citywide, and the current 15.7 percent remains above District 9's 10.0 percent and the city's 5.8 percent (Section 6). Severe crowding follows the same shape: down 23.0 points, from 29.6 percent to 6.6 percent, still above District 9's current 4.2 percent.

d) This CPA is aging faster than both benchmarks at both ends of the age distribution at once. Its under-18 share fell 13.6 percentage points, from 36.6 percent to 23.0 percent, against District 9's 10.3-point drop and the city's 5.6-point drop, while its 65-plus share rose 5.2 points, from 5.3 percent to 10.6 percent, against District 9's 3.4-point rise and the city's 4.3-point rise (Section 7). All 15 tracts show a declining under-18 share, with the spread running from 4.1 to 19.5 points. Tract 22.01 carries both the steepest under-18 decline (-19.5 points) and the steepest 65-plus rise (+15.7 points) in the CPA.

e) All 15 tracts sit in HCD's Low Resource opportunity tier, and no tract carries a Racial Concentration of Affluence (RCAA) classification of any kind. No tract in this CPA reaches Moderate, High, or Highest Resource, and the CPA's mean opportunity score of 1 sits below District 9's own mean of 2 and the citywide mean of 5 (Section 9). Zero tracts fall into either the RCAA-concentrated subtotal or the diversifying/opening subtotal. The RCAA screen is regional affluence and racial composition, the

top 20 percent of county tracts on affluence together with the bottom 20 percent on people-of-color share; this CPA's highest-ranked tract sits at the 23rd percentile on affluence and its lowest at the 69th on people-of-color share.

f) HCD Neighborhood Change pathway flags are less common in this CPA than in District 9 overall. The CPA holds 45.5 percent of District 9's tracts (15 of 33) but accounts for 33.3 percent of the district's flagged tracts (4 of 12) and 40.0 percent of its spillover tracts (6 of 15); its own flagged-tract rate of 26.7 percent (4 of 15) sits below District 9's overall rate of 36.4 percent (12 of 33) (Section 9). Two tracts carry Pathway 1A (24.01 and 26.02), four carry Pathway 2, and no tract carries Pathway 1B.

g) Environmental burden in this CPA runs well above both benchmarks and is broad-based across its tracts rather than concentrated in one of them. The CPA's CalEnviroScreen 5.0 overall percentile is 74.0, against District 9's 58.3 and the city's 37.1, with the widest sub-metric gap on population characteristics (80.8, versus 60.5 district-wide and 35.7 citywide) (Section 10). Excluding the CPA's highest-burden tract, 22.02 at the 88.1 percentile and 6.0 percent of the CPA's population, shifts the population-weighted average by 0.9 points, from 74.0 to 73.1.

Naturally occurring affordable housing. In 2000, 89.64 percent of this community's rentals paying cash rent rented within reach of a household at 60 percent of the county's median family income; in the current period 52.37 percent do, a change of -37.3 points and 7,012 fewer such rentals, against a citywide share that moved from 55.00 to 27.57 percent (-27.4 points). At 80 percent of median family income the share moved from 97.49 to 84.76 percent, -12.7 points and 2,493 fewer such rentals, against a citywide share that moved from 77.12 to 53.05 percent (-24.1 points). These are stock figures: they describe what the rental stock rents for in each period and say nothing about where any household went (Section 8c).

Neighborhood Change: Flagged Less Often Than the District Around It

Four of this CPA's 15 tracts carry an active HCD Neighborhood Change pathway flag and six carry a spillover designation (Section 9). Two tracts meet Pathway 1A (24.01 and 26.02), four meet Pathway 2, and no tract in the CPA meets Pathway 1B. Both Pathway 1A tracts also carry Pathway 2 and spillover, so no tract here carries a Pathway 1A flag on its own, and the two remaining designated tracts carry spillover without a pathway flag (Section 7). The flagged geography reads as contained rather than spreading: nine of the CPA's 15 tracts carry no HCD designation at all, and the flagged tracts do not form a single-tract isolated signal either. Set against the rest of this report, that profile runs in an unexpected direction. This CPA's own flagged-tract rate (26.7 percent) is lower than District 9's overall rate (36.4 percent) even though the CPA lost population while the city grew and the district declined only slightly (Section 2), remains the most crowded of the three geographies (Section 6), shows the steepest under-18 decline and the largest 65-plus rise of the three (Section 7), sits uniformly in the Low Resource tier (Section 9), and carries a CalEnviroScreen percentile well above both benchmarks (Section 10). The CPA does cross two of HCD's three rate-of-change thresholds, on income growth (148.1 percent) and rent growth (73.7 percent), as does District 9 (Section 8b). Why HCD's pathway methodology and this report's other measures point in different directions for the same geography is not established by this data; the divergence is recorded here as a documented pattern, not an explained one.

Additional Context

Owner-occupied households in this CPA grew 22.9 percent, from 5,418 to 6,660, while renter-occupied households fell 2.1 percent, from 18,193 to 17,806 (Section 5a). Asian (alone) owner-occupied households grew 134.5 percent, from 577 to 1,353, the fastest-growing race and tenure cell in the CPA, even as Asian renter-occupied households fell 20.9 percent, a tenure split the CPA's other three race categories do not share. Renter turnover slowed sharply: the share of renters who moved in the last five years fell 53.0 percentage points, from 82.2 percent to 29.2 percent, a steeper drop than District 9's 47.5 points or the city's 36.0 points, and the current renter two-year mover rate of 5.0 percent sits below District 9's 7.2 percent and the city's 10.0 percent (Section 5b). Average household size fell 12.1 percent, from 3.363 to 2.957, and remains above both District 9's 2.627 and the city's 2.521 (Section 4a). Population-weighted median income grew faster here (170.1 percent) than district-wide (166.8 percent) or citywide (134.0 percent) while ending well below both in dollar terms, at $65,555 against District 9's $79,548 and the city's $117,634, a low-base effect rather than evidence of a closing gap (Section 8a). Two limitations bear on the figures above: the race and tenure counts in Section 5a use the ACS "alone" definition and exclude Other/Two+ NH households, a real population category for this CPA (Section 3: 3,879 to 3,761), and 2000 dollar figures are nominal, not inflation-adjusted (Section 8a). These patterns draw on verified Census Bureau data cross-checked against HCD's independent methodologies. The data document patterns of change over time; they do not, on their own, establish why an individual household left a given tract.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

2. Population (2000 → Current)

	CPA 2000	CPA Current	Δ	District 9 2000	District 9 Current	Δ	City 2000	City Current	Δ
Total	83,084	76,398	-8.0%	156,904	154,217	-1.7%	1,184,838	1,351,501	+14.1%
White NH	10,721	11,791	+10.0%	44,644	42,407	-5.0%	578,087	549,251	-5.0%
POC	72,363	64,607	-10.7%	112,260	111,810	-0.4%	606,751	802,250	+32.2%

This CPA's total population declined 8.0 percent while District 9 declined only 1.7 percent and the city grew 14.1 percent – this CPA is losing population well beyond its own district's rate, in the opposite direction from the citywide trend (Section 1).

3. Population by Race Breakdown

Category	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Asian NH	13,637	12,321	-9.6%	19,500	18,389	-5.7%	161,444	237,181	+46.9%
Black NH	11,945	8,902	-25.5%	18,759	13,776	-26.6%	88,855	68,939	-22.4%
Hispanic or Latino	42,902	39,623	-7.6%	66,595	71,247	+7.0%	304,758	404,143	+32.6%
Other/Two+ NH	3,879	3,761	-3.0%	7,405	8,398	+13.4%	51,695	91,987	+77.9%
White NH	10,721	11,791	+10.0%	44,644	42,407	-5.0%	578,087	549,251	-5.0%

This CPA's only race category showing growth is White NH (+10.0%) – every other race category in this CPA declined, including Hispanic or Latino (-7.6%), the CPA's largest population group by a wide margin at both endpoints. District 9's Hispanic or Latino population grew over the same period (+7.0%), the opposite direction from this CPA's own Hispanic or Latino decline (Section 1).

4a. Housing Units & Households (2000 → Current)

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Total units	25,531	27,139	+6.3%	56,526	61,050	+8.0%	460,671	560,804	+21.7%
Occupied units	24,599	25,614	+4.1%	54,426	57,924	+6.4%	442,094	523,840	+18.5%
Vacant/Unoccupied units	932	1,525	+63.6%	2,099	3,126	+48.9%	18,577	36,964	+99.0%
of which: Seasonal/Recreational/Occasional Use	64	20	-68.7%	256	453	+76.9%	5,785	9,999	+72.9%
Vacancy rate	3.7%	5.6%	+2.0pp	3.7%	5.1%	+1.4pp	4.0%	6.6%	+2.6pp
Avg household size	3.363	2.957	-12.1%	2.854	2.627	-8.0%	2.619	2.521	-3.8%

Change categories across this community's tracts, 2000 to current: 6 stable, 5 units grew, 3 changed occupancy pattern, 1 lost units. This CPA's average household size (3.363, falling to 2.957) is well above both District 9's (2.854 → 2.627) and the city's (2.619 → 2.521) at both endpoints, consistent with the CPA's much higher crowding rate (Section 6). Seasonal vacancy is a small and shrinking share of this CPA's already-small vacant stock (6.9% of vacant units in 2000, 1.3% currently) – smaller than District 9's share and far below the citywide share, consistent with no coastal exposure.

4b. Housing Production (6th RHNA Cycle)

The current RHNA cycle began in April 2021. This section reports housing units that reached the Permitted phase of HCD's Annual Progress Report (Table A2) framework from that date forward, the stage at which a project has cleared entitlement and received a building permit. Figures are drawn directly from HCD's own APR submissions, reconciled against the Lab's tract-level geography and opportunity classifications.

> Of the 2,331 below-moderate-income units permitted in High and Highest Resource tracts citywide during the current RHNA cycle, Mid-City:City Heights' own High and Highest Resource tracts accounted for 0, or 0.0%.

Units Permitted, 6th Cycle Summary (April 2021 to Present)

Metric	Mid-City:City Heights	D9	City of San Diego	Geography Share
Existing housing stock (all in-city tracts)	27,139	64,825	568,857	4.8%
Total units permitted	1,078	3,601	35,482	3.0%
Above Moderate income	744	2,713	28,771	2.6%
Below Moderate income (deed-restricted)	334	888	6,711	5.0%
Units permitted per 1,000 existing units	39.7	55.5	62.4	–
Below-moderate units permitted per 1,000 existing	12.3	13.7	11.8	–

Source: HCD Annual Progress Report Table A2, Permitted phase, reconciled to the Lab's tract geography. Below-moderate income includes Acutely Low, Extremely Low, Very Low, Low, and Moderate income tiers combined; in this dataset every below-moderate unit permitted is deed-restricted, so the two figures are not independent counts. Existing housing stock is counted over all in-city census tracts with no group-quarters exclusion, a slightly wider universe than the household and demographic figures in Section 4a and elsewhere, which exclude group-quarters-heavy tracts. Production is a count of construction rather than a household rate, so the group-quarters exclusion that protects household measures does not apply to it. 2025 figures are drawn from the most recent HCD APR submission on file and may not reflect a full calendar year of reporting. Unit-type categories in the table below are HCD's own Table A2 classifications and are not independently re-derived by the Lab.

Units Permitted by Year, Mid-City:City Heights

Year	Total Units Permitted	Below-Moderate Units
2018	44	4
2019	57	1
2020	36	0
2021	143	59
2022	141	0
2023	146	1
2024	432	227
2025	239	47

2018-2020 predate the current RHNA cycle and are shown for trend context only; the 6th-cycle production summary above uses only permits dated April 2021 forward.

Units Permitted by Type

Year	SFD	SFA	2 to 4	5+	ADU	MH	Total
2018	7	0	27	0	10	0	44
2019	13	2	0	8	34	0	57
2020	6	0	3	0	26	1	36
2021	2	0	18	60	63	0	143
2022	1	1	4	75	60	0	141
2023	4	1	0	0	141	0	146
2024	10	1	0	282	139	0	432
2025	6	2	4	12	215	0	239

SFD: single-family detached. SFA: single-family attached. "2 to 4": duplex through fourplex. "5+": multifamily buildings of five units or more. ADU: accessory dwelling unit. MH: mobile home. Categories are HCD's own Table A2 classifications and are not independently re-derived by the Lab. Row totals reconcile exactly to the year-by-year totals in the table above. 2025 figures may not reflect a full calendar year of reporting.

The City of San Diego's 2025 Baker Settlement commits the City to include data demonstrating that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. The settlement counts projects; the figures here count units, so they are a companion measure and not the settlement's own. Citywide, 51.6% of below-moderate units permitted during the current RHNA cycle have landed in those tiers. Mid-City:City Heights' own below-moderate units permitted in Moderate, High, or Highest Resource tracts stand at 0.0%.

5a. Households by Race x Tenure (2000 → Current)

Mid-City:City Heights – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	577	1,353	+776	+134.5%
Black (alone)	679	543	-136	-20.0%
Hispanic or Latino	1,994	2,571	+577	+28.9%
White NH	2,168	2,193	+25	+1.2%
Four-race subtotal	**5,418**	**6,660**	**+1,242**	**+22.9%**
Not covered	146	166	–	–
Household total	**5,564**	**6,826**	**+1,262**	**+22.7%**

Mid-City:City Heights – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	3,018	2,386	-632	-20.9%
Black (alone)	3,701	2,739	-962	-26.0%
Hispanic or Latino	8,144	8,907	+763	+9.4%
White NH	3,330	3,774	+444	+13.3%
Four-race subtotal	**18,193**	**17,806**	**-387**	**-2.1%**
Not covered	842	982	–	–
Household total	**19,035**	**18,788**	**-247**	**-1.3%**

District 9 – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	1,083	2,232	+1,149	+106.1%
Black (alone)	1,010	1,082	+72	+7.1%
Hispanic or Latino	3,620	4,977	+1,357	+37.5%
White NH	10,813	10,476	-337	-3.1%
Four-race subtotal	**16,527**	**18,767**	**+2,240**	**+13.6%**
Not covered	335	860	–	–
Household total	**16,862**	**19,627**	**+2,765**	**+16.4%**

District 9 – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	4,492	4,004	-488	-10.9%
Black (alone)	6,459	4,886	-1,573	-24.4%
Hispanic or Latino	12,830	16,068	+3,238	+25.2%
White NH	11,986	11,274	-712	-5.9%
Four-race subtotal	**35,768**	**36,232**	**+464**	**+1.3%**
Not covered	1,796	2,065	–	–
Household total	**37,564**	**38,297**	**+733**	**+2.0%**

City of San Diego – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	24,172	48,159	+23,987	+99.2%
Black (alone)	11,124	7,948	-3,176	-28.6%
Hispanic or Latino	27,478	43,704	+16,226	+59.1%
White NH	152,986	139,318	-13,668	-8.9%
Four-race subtotal	**215,760**	**239,129**	**+23,369**	**+10.8%**
Not covered	4,827	10,722	–	–
Household total	**220,587**	**249,851**	**+29,264**	**+13.3%**

City of San Diego – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	22,271	36,133	+13,862	+62.2%
Black (alone)	21,734	20,730	-1,004	-4.6%
Hispanic or Latino	49,980	76,480	+26,500	+53.0%
White NH	119,064	123,964	+4,900	+4.1%
Four-race subtotal	**213,049**	**257,307**	**+44,258**	**+20.8%**
Not covered	8,459	16,682	–	–
Household total	**221,508**	**273,989**	**+52,481**	**+23.7%**

Black/Asian use the ACS "alone" definition here, not the NH-exclusive definition used in Section 3 – not directly comparable across the two sections. This CPA's Black (alone) households declined on both tenures (owner -20.0%, renter -26.0%), a smaller owner/renter gap than District 9's Black households (owner +7.1%, renter -24.4% – District 9's Black owner count actually grew slightly while renter count fell sharply). Asian (alone) owner-occupied households in this CPA grew the fastest of any race/tenure cell in the CPA (+134.5%), even as Asian renter-occupied households fell (-20.9%) – a tenure-flip pattern not shared by the CPA's other three race categories. These four race categories do not sum exactly to Section 4a's occupied-unit totals – the race-by-tenure source excludes Other/Two+ NH households, a real, non-trivial population category for this CPA (Section 3: 3,879 → 3,761).

"Not covered" is the household total less the four categories printed above it, as printed. The categories come from a different Census table than the total and the 2000 values are allocated onto current tract boundaries, so the difference can fall below zero; where it does the cell is not stated. The row is the net of households the four categories omit and households they count twice, not a category, and no rate of change is computed on it.

5b. Mobility

Mobility (% Moved in Last 5 Years)

Metric	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Owner	33.9%	14.4%	36.9%	15.1%	37.0%	14.5%
Renter	82.2%	29.2%	82.8%	35.3%	81.0%	45.0%

This CPA's current renter mobility (29.2%) sits below both District 9's (35.3%) and the city's (45.0%) – renter turnover here is markedly lower than either benchmark.

Mobility (% Moved in Last 2 Years)

Metric	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Owner	10.0%	3.1%	12.3%	1.7%	12.0%	1.8%
Renter	37.9%	5.0%	40.9%	7.2%	41.4%	10.0%

Source: American Community Survey, year the householder moved into the unit. 2013 is omitted entirely, not shown as zero: no bracket finer than ~4 years exists in the ACS 2009-2013 5-year vintage, so both figures are empty for every tract in this CPA, District 9, and citywide in 2013. This CPA's current renter 2yr-mover rate (5.0%) sits below both District 9's (7.2%) and the city's (10.0%), consistent with the 5yr table above.

6. Crowding

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
% Crowded	42.1%	15.7%	-26.4pp	26.9%	10.0%	-16.9pp	12.6%	5.8%	-6.8pp
% Severely Crowded	29.6%	6.6%	-23.0pp	17.7%	4.2%	-13.5pp	7.2%	2.4%	-4.7pp

This CPA started far more crowded than either benchmark in 2000 (42.1% vs. 26.9% district-wide and 12.6% citywide) and, despite the largest absolute easing of any geography shown here (-26.4pp), remains the most crowded of the three at the current endpoint (15.7% vs. 10.0% district-wide and 5.8% citywide). Severe crowding shows the same pattern: this CPA fell furthest in absolute terms (-23.0pp) but still ends noticeably above District 9's current rate (6.6% vs. 4.2%).

7. Age Composition (2000 → Current)

Bracket	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Under 18	36.6%	23.0%	30.0%	19.7%	24.4%	18.8%
18-34	30.9%	30.2%	33.2%	32.9%	29.0%	28.4%
35-64	27.1%	36.2%	29.6%	36.7%	36.0%	37.9%
65+	5.3%	10.6%	7.2%	10.6%	10.6%	14.9%

This CPA's under-18 share fell 13.6 percentage points (36.6% → 23.0%), the largest drop of the three geographies (District 9: -10.3pp, City: -5.6pp). Its 65+ share also rose the most of the three (+5.2pp, vs. District 9's +3.4pp and the city's +4.3pp), converging with District 9 at the current endpoint (both 10.6%) despite starting 1.9 points below District 9 in 2000. This CPA is aging faster than both benchmarks on both measures at once – its under-18 decline is the steeper of the two shifts in absolute terms, but neither shift is small (Section 1).

Per-tract age-bracket swings, ranked by under-18 decline (steepest first):

Tract	<18 share 2000 → Current	<18 Δ	65+ share 2000 → Current	65+ Δ	HCD Pathway
22.01	37.5% → 17.9%	**-19.5pp**	3.3% → 19.0%	+15.7pp	Pathway 2, Spillover
23.02	36.3% → 17.8%	-18.5pp	5.0% → 8.7%	+3.7pp	Pathway 2, Spillover
26.02	40.4% → 21.9%	-18.5pp	4.2% → 8.8%	+4.6pp	Pathway 1A, 2, Spillover
34.01	27.1% → 9.1%	-18.1pp	12.3% → 22.2%	+9.9pp	–
27.07	41.0% → 23.7%	-17.3pp	3.0% → 7.1%	+4.2pp	Spillover
24.02	38.1% → 22.7%	-15.4pp	4.3% → 9.6%	+5.3pp	–
24.01	36.2% → 21.7%	-14.5pp	4.0% → 8.5%	+4.5pp	Pathway 1A, 2, Spillover
27.09	41.4% → 28.5%	-12.9pp	4.4% → 6.4%	+1.9pp	–
25.01	36.9% → 24.8%	-12.1pp	4.4% → 9.4%	+5.0pp	–
22.02	36.4% → 24.6%	-11.7pp	6.2% → 14.0%	+7.8pp	–
27.10	39.3% → 27.9%	-11.4pp	5.7% → 8.6%	+2.9pp	–
16	30.9% → 19.4%	-11.4pp	5.0% → 7.7%	+2.7pp	Spillover
26.01	39.9% → 28.8%	-11.2pp	4.2% → 9.4%	+5.2pp	–
27.08	38.7% → 30.5%	-8.2pp	5.3% → 10.9%	+5.7pp	–
25.02	31.8% → 27.6%	-4.1pp	8.1% → 9.5%	+1.4pp	–

Every tract in this CPA shows a declining under-18 share; the range runs from -4.1pp to -19.5pp, a wide spread across a CPA of only 15 tracts. 22.01 shows the CPA's steepest under-18 decline and its steepest 65+ rise simultaneously – the largest combined age-composition swing in the CPA, and carries an HCD Pathway 2 flag with spillover (see Section 9).

8a. Economic Trend (Population-Weighted Medians)

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Income	$24,269	$65,555	+170.1%	$29,820	$79,548	+166.8%	$50,274	$117,634	+134.0%
Home value	$114,301	$613,264	+436.5%	$141,984	$703,432	+395.4%	$226,860	$932,173	+310.9%
Monthly cost	$625	$1,790	+186.5%	$715	$1,987	+177.9%	$1,079	$2,499	+131.6%

This CPA's income and home value both remain well below District 9's and the city's at both endpoints, but grew at a faster percentage rate than either benchmark over the period (income +170.1% vs. +166.8% district-wide and +134.0% citywide; home value +436.5% vs. +395.4% district-wide and +310.9% citywide) – a low-base effect common to this CPA's starting position, not evidence the CPA has closed the gap in dollar terms. 2000 figures are nominal 1999 dollars, not inflation-adjusted – see the Sources and Methods section for the nominal-dollars caveat, which applies identically here.

8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change)

	Mid-City:City Heights	District 9	City of San Diego	Regional Threshold
Income change 2000-2023	148.1% (ABOVE)	144.5% (ABOVE)	126.1% (ABOVE)	50th pctile: 109.3%
Rent change 2013-2023	73.7% (ABOVE)	70.1% (ABOVE)	64.8% (ABOVE)	50th pctile: 64.5%
Home value/income gap	+2.3pp (below 25pp)	+0.1pp (below 25pp)	-4.2pp (below 25pp)	flat 25pp

This CPA crosses both the income-growth and rent-growth HCD thresholds (2 of 3 indicators), a more intense profile than District 9 overall, which also crosses both but by a narrower margin. HCD's published rate-of-change values are converted from fractions to percentages here, as in every Lab report (Sources and Methods).

8c. Naturally Occurring Affordable Housing

A rental counts as affordable here when its gross rent is at or below 30 percent of a stated share of HUD's median family income for San Diego County, divided by twelve. At 60 percent of median family income the threshold was $805.50 a month in 2000 and is $1,792.50 in the current period; at 80 percent, $1,074.00 and $2,390.00. No subsidy status, building age or covenant enters the test: it is a rent test on the whole rental stock, which is what "naturally occurring" means. The denominator is renter-occupied homes paying cash rent. **Units, not households**: the Census reports what a home rents for, not who lives in it.

Rentals affordable at 60 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:City Heights	15	18,613	16,685	89.64%	18,469	9,673	52.37%	-37.3	-20.9	-7,012	-3,982
District 9	33	37,119	29,490	79.45%	37,765	16,657	44.11%	-35.3	-20.7	-12,833	-7,299
City of San Diego	311	212,529	116,897	55.00%	268,003	73,894	27.57%	-27.4	-18.2	-43,004	-18,621

Rentals affordable at 80 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:City Heights	15	18,613	18,146	97.49%	18,469	15,653	84.76%	-12.7	-7.6	-2,493	-1,540
District 9	33	37,119	34,262	92.30%	37,765	28,516	75.51%	-16.8	-10.4	-5,746	-3,325
City of San Diego	311	212,529	163,898	77.12%	268,003	142,181	53.05%	-24.1	-15.3	-21,717	-405

Census 2000 (SF3 table H062, harmonised to 2020 tract boundaries) against ACS 2020-2024 (table B25063). Where a threshold falls inside a published rent bracket, the units in that bracket are counted in proportion to where the threshold sits. **Change** is the current share minus the 2000 share as printed, in points; it recomputes from the two shares beside it on every row. **Floor** is the change in share when every unit in the boundary bracket is counted as affordable now and none of them in 2000, so it is the figure that survives an adversarial reading. **Change, worst case** applies the same treatment to the count. Figures sum units across member tracts and then divide; no figure is an average of tract shares. Every row is the 311-tract household universe described at the top of this report, so the community, district and city rows are comparable with each other. Every row holds its direction under either treatment of the boundary bracket.

Tract detail. A tract share is stated only where it survives three rules: at least 100 rentals paying cash rent in both years, a coefficient of variation (CV) at or under 30 percent on the rent bracket containing the threshold, and a low-to-high band no wider than 25 points. Where it does not, the count stands alone and the reason is given. The current-period rent brackets are $500 wide above $1,500 and both thresholds fall inside one, which is why most tract shares carry bands too wide to state; the community is the reportable unit. Do not restore a suppressed share from the counts.

Tract detail at 60 percent, 15 tracts, 1 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
16	1,733	855	not stated	band 41 pts
22.01	927	538	54%	
22.02	1,337	902	not stated	band 42 pts
23.02	1,637	1,031	not stated	band 38 pts
24.01	1,342	430	not stated	band 32 pts
24.02	1,123	943	not stated	band 50 pts
25.01	933	313	not stated	CV 30; band 29 pts; 2000 reallocated from more than one source tract
25.02	590	519	not stated	band 35 pts
26.01	960	471	not stated	band 44 pts
26.02	783	306	not stated	band 37 pts; 2000 reallocated from more than one source tract
27.07	1,558	919	not stated	band 47 pts
27.08	1,932	1,218	not stated	band 42 pts
27.09	749	507	not stated	band 35 pts
27.10	666	398	not stated	band 34 pts
34.01	415	321	not stated	CV 31; band 38 pts

Tract detail at 80 percent, 15 tracts, 3 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
16	1,901	1,402	77%	
22.01	1,010	870	not stated	CV 33; band 30 pts
22.02	1,399	1,301	93%	
23.02	1,773	1,543	not stated	CV 35
24.01	1,413	861	not stated	band 25 pts
24.02	1,181	1,463	95%	
25.01	1,035	570	not stated	band 28 pts; 2000 reallocated from more than one source tract
25.02	800	765	not stated	CV 39
26.01	1,087	764	not stated	CV 39
26.02	839	844	not stated	CV 39; band 44 pts; 2000 reallocated from more than one source tract
27.07	1,610	1,362	not stated	CV 30
27.08	1,981	1,719	not stated	CV 30
27.09	825	830	not stated	band 26 pts
27.10	727	689	not stated	CV 38; band 27 pts
34.01	565	670	not stated	CV 41; band 32 pts

These are stock figures. They say how much of the rental stock rents below a threshold; they do not say where anyone went or why, and setting them beside growth figures describes two things happening at once rather than one causing the other. Deed-restricted homes renting below the threshold are inside these counts, not subtracted from them. Where a 2000 count is marked as reallocated, that tract's 2000 figure is an estimate allocated from more than one 2000 census tract onto the current boundary. Reference incomes are HUD's median family income for San Diego County, $53,700 for fiscal year 2000 and $119,500 for fiscal year 2024; each threshold is 30 percent of the stated share of that income, divided by twelve.

9. Supplementary Context

HCD Opportunity Tier

Source: California HCD 2026 Opportunity Map. The opportunity score is a 0-9 ordinal tier (0-3 Low Resource, 4-5 Moderate, 6-7 High, 8-9 Highest), not a percentile.

Tier	Mid-City:City Heights	District 9	City of San Diego
Highest Resource	0	1	117
High Resource	0	1	53
Moderate Resource	0	7	45
Low Resource	15	24	95
Unclassified	0	0	1
Total tracts	**15**	**33**	**311**
Mean opportunity score (0-9, wtd)	1	2	5
Environmental burden flag (tract count)	1	0	23
High-poverty & segregation flag (tract count)	2	2	3

Every one of this CPA's 15 tracts is Low Resource – one of two CPAs in the Lab's Mid-City set with a uniformly Low Resource profile, alongside Mid-City:Eastern Area (see Mid-City:Kensington-Talmadge and Mid-City:Normal Heights for contrast). This CPA's mean opportunity score (1) sits below District 9's own mean (2), meaning this CPA pulls the district's average down rather than tracking it.

HCD Neighborhood Change Pathway Flags

Pathway	Mid-City:City Heights	District 9	City of San Diego
Pathway 1A	2	8	28
Pathway 1B	0	3	9
Pathway 2	4	11	35
Any Pathway	4	12	44
Spillover	6	15	53
Total tracts	**15**	**33**	**311**

This CPA holds 45.5% of District 9's tracts (15 of 33) but accounts for only 33.3% of the district's flagged tracts (4 of 12) and 40.0% of its spillover tracts (6 of 15) – this CPA's own flagged-tract rate (4 of 15, 26.7%) is lower than District 9's overall rate (12 of 33, 36.4%), meaning HCD pathway flags are somewhat less common here than elsewhere in the district, not concentrated here. This sits alongside this CPA's uniformly Low Resource opportunity tier (this section, above) and its steep under-18/rising-65+ age swings (Section 7) as a reminder that HCD's pathway methodology and the Lab's other measures do not always point the same direction for the same geography – see the Community Plan Update context below and the companion Mid-City:Eastern Area report for a sharper version of this same divergence. Both of this CPA's Pathway 1A tracts (24.01, 26.02) also carry Pathway 2 and Spillover – no tract in this CPA carries Pathway 1A alone (Section 7).

Racial Concentration of Affluence (RCAA)

Reported per the Lab's two-subtotal convention: RCAA-concentrated (Persistent + Reinforcing/Intensifying + Newly RCAA) and diversifying/opening (Converging High-Opportunity + Diversifying Affluent) are reported as separate subtotals, never combined.

	Mid-City:City Heights	District 9	City of San Diego
RCAA-concentrated subtotal	0	1	26
Diversifying/opening subtotal	0	1	28
None	15	31	257
Total tracts	**15**	**33**	**311**

This CPA carries zero tracts in either subtotal. The RCAA screen is the top 20 percent of county tracts on a composite of income, home value and housing cost together with the bottom 20 percent on people-of-color share; this CPA's highest-ranked tract sits at the 23rd percentile on affluence and its lowest at the 69th on people-of-color share, so no tract here is near the screen.

Cross-Cluster Context: Southeast Communities

All 15 of this CPA's tracts sit inside the Lab's Southeast Communities cluster (53 tracts across six community planning areas), meaning every figure in this report is a subset of that broader cluster's geography, not an independent sample. The cluster report itself is a city-only comparison (District 4 holds a 54.7% majority with real minority blocks in District 9 and District 8, per the Lab's report conventions) – a different comparison structure from this CPA-tier report's District 9 + city columns, since this CPA alone, unlike the cluster as a whole, sits almost entirely in a single district. Readers consulting the Lab's earlier SR-94 corridor cluster report for this geography should note that cluster was deprecated and its membership, including this CPA, redistributed to the Southeast Communities cluster; the archived cluster's figures should not be treated as current.

Community Plan Update Context

These findings are produced in the context of the City of San Diego's ongoing Mid-City Communities Community Plan Update. The patterns most directly relevant to this CPA are displacement pressure and racial compositional change: this CPA lost population (-8.0%) while the city grew and District 9 declined only slightly (Section 2), its Black NH population fell substantially (-25.5%, a faster rate than the city's -22.4%, though slightly slower than District 9's own -26.6% – see Section 3), and 4 of its 15 tracts carry an active HCD Neighborhood Change pathway flag against a uniformly Low Resource opportunity-tier backdrop (this section, above). Without making a causal claim the data cannot support, the plan update is a concrete opportunity under AB 686 and the City's AFFH obligations to affirmatively address the fair housing patterns documented in this report – the data documents the condition; the plan update is the policy moment.

10. Climate Equity

Source: CalEnviroScreen 5.0. Percentiles are on a 0-100 scale; higher means greater burden/vulnerability.

Metric	Mid-City:City Heights (wtd)	District 9 (wtd)	City of San Diego (wtd)
CES 5.0 overall percentile	74.0	58.3	37.1
Pollution burden percentile	55.7	52.6	43.6
Population characteristics percentile	80.8	60.5	35.7
Traffic percentile	65.5	63.7	57.7
Drinking water percentile	18.9	18.8	20.3

This CPA's overall CES percentile (74.0) sits well above both District 9 (58.3) and the city (37.1), driven especially by its population characteristics percentile (80.8), the largest gap of the four sub-metrics against both benchmarks.
Concentration check: the top tract, 22.02, carries a CES percentile of 88.1 and holds 6.0% of the CPA's population; excluding it shifts the population-weighted average by only 0.9 points (74.0 → 73.1) – a small, genuine effect. This CPA's high environmental burden is broad-based across its 15 tracts, not a rollup artifact resting on one or two tracts. Drinking water percentile carries the standing drinking-water caution described in the Sources and Methods section – do not read the CPA-vs-District gap on that specific metric (18.9 vs. 18.8) as a real neighborhood-level difference.

11. Sources and Methods

Data sources. U.S. Census Bureau: the 2000 Decennial Census (Summary File 3) and the American Community Survey five-year estimates for 2020-2024, with the 2009-2013 estimates shown as a middle point where a 2013 column appears. California HCD's 2026 Opportunity Map and Neighborhood Change methodology. HCD Annual Progress Report Table A2 for housing production. CalEnviroScreen 5.0. HUD median family income for San Diego County, fiscal years 2000 and 2024, for Section 8c.

Geography and the citywide basis. Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced. Census tracts are on 2020 boundaries; 2000 figures are allocated onto them through the Census Bureau's tract relationship files, and where a current tract draws on more than one 2000 tract its 2000 figure is an estimate. Section 4b's production figures are the one exception to the 311-tract basis: production is a count of construction rather than a household rate, so its existing-stock denominator uses all in-city tracts with no group-quarters exclusion.

Comparison columns. This community's 15 census tracts are split 14 in Council District 9 (93.33 percent) and 1 in Council District 4 (6.67 percent). The District 4 share is a single tract and is treated as negligible, so the report compares the community with District 9 and with the city. The community column includes all 15 tracts; the District 9 column is the whole district, not only this community's part of it.

How figures are aggregated. Rates sum numerators and denominators across tracts before dividing. Medians (income, home value, monthly housing cost) are population-weighted averages of tract medians. Section 8c sums rental units across tracts and then divides. No figure in this report is an average of tract shares.

Dollars. 2000 dollar figures are nominal 1999 dollars, not inflation-adjusted. The 2000 median monthly housing cost carries a reliability caution and should be read as indicative.

Race categories. Sections 2 and 3 use non-Hispanic-exclusive categories: White NH, Black NH, Asian NH and Other/Two+ NH are non-Hispanic, and Hispanic or Latino is any race. Section 5a's Black and Asian householders use the Census "alone" definition, which is not restricted to non-Hispanic, so Section 5a is not drawn from the same universe as Sections 2 and 3 and the two cannot be differenced against each other.

Income change measured two ways. Section 8a reports the change in the population-weighted median household income from 2000 to the current period. Section 8b reports HCD's own rate-of-change measure over HCD's periods (2000-2023 for income, 2013-2023 for rent) against HCD's regional thresholds. The two use different series and periods and are not expected to agree. HCD publishes its rate-of-change values as fractions; they are multiplied by 100 to read as percentages, confirmed against HCD's own methodology, and the same conversion is applied in every Lab report.

Racially concentrated areas of affluence. A tract meets the RCAA screen when it sits in the top 20 percent of San Diego County tracts on a composite of median income, median home value and median monthly housing cost, and in the bottom 20 percent on the share of residents who are people of color, each ranked within its own period. Tracts meeting the screen are Persistent, Newly or Reinforcing/Intensifying RCAA by how they moved between periods; Converging High-Opportunity (High or Highest Resource tracts becoming more representative) and Diversifying Affluent (affluent tracts no longer meeting the screen) are not RCAA. RCAA figures follow a two-subtotal convention: the concentrated subtotal (Persistent, Reinforcing/Intensifying and Newly RCAA) is reported separately from the diversifying subtotal (Converging High-Opportunity and Diversifying Affluent), and the two are never summed into one total, because they point in opposite directions.

Drinking water percentile. CalEnviroScreen's drinking water indicator carries a standing caution in the Lab's data-quality log: it reads as a near-constant value across most of the city, so differences on that one measure should not be read as confirmed.

Tract highlights. Section 12's tract list comes from a scan of every tract in the community for four signals: the largest age-bracket percentage-point swings from 2000 to the current period, any HCD Neighborhood Change pathway flag, any RCAA classification, and any earlier tract-level analysis by the Lab. For this community the scan surfaced age-bracket swings across all 15 tracts (Section 7) and 6 HCD-designated tracts, 4 with a pathway flag and 2 with spillover only (Section 9), and zero RCAA-concentrated tracts.

Documents cited in this report. This report is Appendix 1 to the Mid-City Communities Fair Housing Review (San Diego Fair Housing Lab, 2026), which reads the four community reports together against the draft Mid-City Communities Plan. Its companions are the Eastern Area, Kensington-Talmadge and Normal Heights community reports. The following Lab working documents are referred to in the text and are not published; the methods they carry are restated above.

- The Lab's earlier SR-94 corridor cluster report: cited in Section 9.
- The Lab's report conventions: cited in Section 9.

12. Tract-Level Detail

The tracts below are the ones the highlight scan (Section 11) surfaced. None has yet been the subject of a tract-level report, and the notes record what the scan found so that a future one starts from them.

Notable tracts

- **22.01** – the CPA's steepest under-18 decline (-19.5pp) and steepest 65+ rise (+15.7pp) simultaneously, the largest combined age-composition swing in the CPA. Carries an HCD Pathway 2 flag and Spillover designation. No RCAA classification.
- **26.02** – one of only two tracts in the CPA carrying an HCD Pathway 1A flag (alongside Pathway 2 and Spillover), and the CPA's 2nd/3rd-steepest under-18 decline (-18.5pp, tied with 23.02). No RCAA classification.
- **24.01** – the CPA's other Pathway 1A tract (also carrying Pathway 2 and Spillover). Under-18 decline -14.5pp, mid-pack for the CPA. No RCAA classification.
- **34.01** – the CPA's largest combined age swing among tracts with no HCD pathway flag at all (under-18 -18.1pp, 65+ +9.9pp). Its 2000 under-18 share (27.1%) and 65+ share (12.3%) both started closer to the city's profile than any other tract in this CPA, making its swing pattern distinct from the rest of the CPA's more uniformly young-in-2000 tracts.

These four tracts have not been checked against permit or development records or any other independent source, and they are named here as candidates for a future tract-level report rather than built out in this one.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

Terms used in this document

Census tract
A small statistical area the Census Bureau uses to report data, usually holding between 1,200 and 8,000 people. San Diego's city limits contain 311 of them in this analysis, 30 of which sit inside the Mid-City plan boundary. It is the smallest geography at which the figures in this review can be reported.

Community planning area (CPA)
The City of San Diego's own neighborhood planning boundaries. City Heights, Eastern Area, Kensington-Talmadge and Normal Heights are each one, and together they make up the Mid-City Communities Plan boundary. Every figure here that names a neighborhood uses these official boundaries.

Opportunity tier
A four-level ranking published by California's housing department and tax credit committee, placing every census tract in the state in Low, Moderate, High or Highest Resource based on measures of education, economic conditions and environment. It is the State's classification, not this organization's.

Low Resource
The lowest of the State's four opportunity tiers. Twenty-three of the thirty tracts in the Mid-City plan boundary sit here, against 95 of 311 citywide.

Moderate Resource
The second of the State's four opportunity tiers. Six Mid-City tracts sit here.

High Resource
The third of the State's four opportunity tiers. One Mid-City tract sits here, in Normal Heights.

Highest Resource
The top of the State's four opportunity tiers. No tract inside the Mid-City plan boundary sits here; 117 tracts citywide do.

Neighborhood change area
A tract carrying one of the State's Neighborhood Change pathway designations, its marker for a historically lower-income community of color that has since seen substantial racial and economic change. Nine of the thirty Mid-City tracts carry one, against 44 of 311 citywide.

Neighborhood Change pathway
The State's method for identifying neighborhood change, published in 2026. A tract can qualify under Pathway 1A, 1B or 2, each testing a different combination of historical condition, demographic change and housing-cost pressure. This review refers to a tract carrying any of them as a neighborhood change area.

Rate-of-change threshold
Part of the State's neighborhood change method. A tract is tested against regional benchmarks for how fast its income, its racial composition and its rents have moved. The rent benchmark for the San Diego region is 64.5 percent growth since 2013.

Racially Concentrated Area of Affluence (RCAA)
A neighborhood where high-income, predominantly non-Hispanic White households are concentrated well above the regional norm. State law now requires every California jurisdiction's housing element to analyse these areas specifically. One tract inside the Mid-City plan boundary carries this classification.

Persistent RCAA
A tract classified as a Racially Concentrated Area of Affluence at every point measured, rather than one that has recently become or ceased to be one. Tract 20.01 in Kensington-Talmadge is District 9's only one.

RECAP
A Racially and Ethnically Concentrated Area of Poverty, the counterpart to an RCAA. The City's own Housing Element Fair Housing Appendix places two City Heights tracts inside its RECAP cluster.

Affirmatively furthering fair housing (AFFH)
The legal duty, under California Government Code section 8899.50 and AB 686, to take meaningful actions that overcome patterns of segregation and foster inclusive communities, rather than simply avoiding discrimination. It applies to a community plan update as it does to a housing element.

AB 686
A 2018 California law, effective 2019, requiring every housing element to include a data-driven, geographically specific analysis of segregation patterns, disparities in access to opportunity and concentrated poverty, and to set goals and actions addressing what that analysis finds.

AB 1304
A 2021 California law, in effect from 2022, that sharpened AB 686 by requiring every housing element's fair housing analysis to identify racially or ethnically concentrated areas of affluence as well as of poverty, and to show how the sites the jurisdiction plans for housing affirmatively further fair housing. It applies statewide.

Baker Settlement
A binding commitment the City of San Diego entered in March 2025, agreeing to show that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. It is a reporting duty rather than a requirement to build, and it counts projects rather than homes.

CalEnviroScreen
California's tool for scoring cumulative pollution burden and community vulnerability, reported as a statewide percentile from 0 to 100. A higher number means greater burden. City Heights sits at 74.0 against a citywide 37.1.

RHNA
The Regional Housing Needs Allocation, the State's assignment to each jurisdiction of how many homes it must plan for, by income level, over an eight-year cycle.

Capacity
What a plan's land use map would allow to be built, if every site that could redevelop did. It is not a forecast of what will be built, and this review does not treat it as one. The draft does not publish capacity by community planning area.

Permitted
A home the City has authorised. It is not yet a home that exists. This review reports production as permitted or as completed and never computes a rate between the two.

Completed
A home that has been built and finished, as distinct from one that has been permitted.

Below-moderate housing
Homes permitted at any affordability level other than above-moderate: the moderate tier and every tier below it. In practice these are deed-restricted affordable units. This review reports it as units permitted per 1,000

existing homes so communities of different sizes can be compared.

Deed-restricted

A home carrying a legal restriction that keeps it affordable to households at a stated income level for a set period, rather than one that happens to be inexpensive at the moment.

Accessory dwelling unit (ADU)

A small secondary home on a lot that already has a house, sometimes called a granny flat or backyard unit. About seven in ten housing permits in Mid-City are for these, against about two in ten citywide.

Suitable sites inventory

The list of parcels a jurisdiction identifies as able to accommodate its assigned housing need. The City's own inventory places 36.3 percent of its suitable sites inside areas it identifies as carrying displacement risk.

Crowding

A household living at more than one person per room. City Heights' rate is 15.7 percent against a citywide 5.8 percent.

Growth gap

The difference between a community's housing unit growth and its population growth, in percentage points. A positive gap means units were added faster than people arrived. Two of the four Mid-City communities added housing while losing population, and three of the four added housing faster than people arrived.

Displacement risk area

A geography the City's own Housing Element Fair Housing Appendix identifies as carrying elevated risk that lower-income residents will be pushed out. All four Mid-City communities appear in the City's lists.

Margin of error

The range within which a survey estimate is likely to fall. American Community Survey figures for small areas carry wide margins, which is why this review reports some measures at community level rather than tract level.

Eastern Area Community Fair Housing Report

Appendix 2 to the Mid-City Communities Fair Housing Review

Prepared by San Diego Fair Housing Lab
Date September 2026
Mid-City Communities Plan Update, September 2026

Contents

About this report 3
1. Narrative 4
2. Population (2000 → Current) 8
3. Population by Race Breakdown 9
4a. Housing Units & Households (2000 → Current) 10
4b. Housing Production (6th RHNA Cycle) 11
5a. Households by Race x Tenure (2000 → Current) 13
5b. Mobility 15
6. Crowding 16
7. Age Composition (2000 → Current) 17
8a. Economic Trend (Population-Weighted Medians) 18
8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change) 19
8c. Naturally Occurring Affordable Housing 20
9. Supplementary Context 22
10. Climate Equity 25
11. Sources and Methods 26
12. Tract-Level Detail 28
Terms used in this document 29

About this report

Mid-City Communities Plan Update. Community planning area: Mid-City:Eastern Area. Appendix 2 to the Mid-City Communities Fair Housing Review. San Diego Fair Housing Lab, 2026.

How to read the City of San Diego columns. Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced.

How to read the comparison columns. This community's 7 census tracts are split 4 in Council District 9 (57.14 percent) and 3 in Council District 4 (42.86 percent). Neither block is negligible, so the report compares the community with the city only and carries no district column.

This report covers demographic, housing and economic change from 2000 to the current period (American Community Survey 2020-2024) for one of the four communities in the Mid-City Communities Plan Update, with companion reports for City Heights, Kensington-Talmadge and Normal Heights. Sources and methods are set out in Section 11.

1. Narrative

This report examines demographic, housing, and economic change in the Mid-City:Eastern Area community planning area from 2000 to the current period, comparing the CPA against the citywide baseline only. Its 7 tracts split 57.14 percent District 9 (4 tracts) and 42.86 percent District 4 (3 tracts), a real majority paired with a minority block far too large to treat as negligible, so this report carries no district comparison column (Section 11). It draws on U.S. Census Bureau data (2000 Decennial Census and American Community Survey estimates) alongside California HCD's Neighborhood Change and Opportunity Map methodologies. The central finding of this report is a confirmed, CPA-wide instance of a gap in HCD's own detection methodology: White NH population here fell 26.0 percent while POC population grew 42.1 percent, a shift that reproduces from the tract counts in this report, and not one of the CPA's 7 tracts carries an HCD Neighborhood Change pathway flag or spillover designation of any kind. The remainder of the CPA's record sits around that finding, including a uniform Low Resource opportunity tier, an owner-mobility rate that has fallen close to zero, and an average household size moving opposite the citywide direction.

Key Findings

a) This CPA shows a large, independently re-verified racial compositional shift that HCD's Neighborhood Change methodology does not detect at any geographic scale tested. White NH population fell 26.0 percent CPA-wide, from 12,562 to 9,292, while POC population grew 42.1 percent, from 19,530 to 27,757 (Section 2). Within that footprint, the 3-tract District 4 slice that the Lab's earlier analysis documented shows White NH falling from 3,253.03 to 1,905 (-41.4 percent) against POC growth from 9,145.20 to 11,917 (+30.3 percent), and the 4-tract District 9 slice shows White NH falling from 9,308.89 to 7,387 (-20.6 percent) against POC growth from 10,384.85 to 15,840 (+52.5 percent), both reproduced exactly here from the tract counts. All three geographies, and the full 7-tract CPA, return zero HCD pathway flags and zero spillover (Section 9).

b) White NH population fell more than five times as fast here as citywide, while Black NH population declined far more mildly than citywide. White NH fell 26.0 percent against a 5.0 percent citywide decline, and Black NH fell 7.1 percent, from 5,370 to 4,990, against a 22.4 percent citywide decline (Section 2, Section 3). Hispanic or Latino population grew 73.9 percent, from 8,135 to 14,145, against 32.6 percent citywide, while Asian NH grew 64.0 percent against 46.9 percent citywide and Other/Two+ NH grew 1.5 percent against 77.9 percent citywide (Section 3). Total population grew 15.4 percent, from 32,092 to 37,049, close to the citywide 14.1 percent, so the compositional movement occurred without an unusual aggregate growth rate (Section 2).

c) All 7 tracts sit in HCD's Low Resource opportunity tier, and no tract carries a Racial Concentration of Affluence (RCAA) classification of any kind. No tract reaches Moderate, High, or Highest Resource, and the CPA's mean opportunity score of 1 sits below the citywide mean of 5 (Section 9). Zero tracts fall into either the RCAA-concentrated subtotal or the diversifying/opening subtotal; the RCAA screen is the top 20 percent of county tracts on affluence together with the bottom 20 percent on people-of-color share, and this CPA's highest-ranked tract sits at the 40th percentile on affluence and its lowest at the 51st on people-of-color share. No tract carries HCD's environmental burden flag (23 citywide) or its high-poverty-and-segregation flag (3 citywide) (Section 9).

d) The CPA crosses 1 of HCD's 3 regional rate-of-change thresholds against the citywide 2-of-3 profile, a second measure on which HCD's instruments register this geography as quiet. Income change registers 115.5 percent against a 50th-percentile threshold of 109.3 percent and crosses it; rent change registers 61.8 percent against a 64.5 percent threshold and does not cross, while the citywide figure of 64.8 percent does; and the home value to income gap registers -3.9 percentage points against a flat 25-point threshold, below the crossing line, as is the citywide -4.2 points (Section 8b). This aggregate result sits alongside the zero pathway flags recorded at the tract level, so both of HCD's instruments read low here (Section 8b, Section 9).

e) Owner turnover has nearly stopped: 0.1 percent of owner households moved within the last two years, against 1.8 percent citywide. The CPA's two-year owner mover rate fell from 10.6 percent in 2000 to 0.1 percent currently, while the citywide rate fell from 12.0 percent to 1.8 percent (Section 5b). Renter turnover fell on the same measure, from 42.1 percent to 6.1 percent against a citywide move from 41.4 percent to 10.0 percent, and the five-year renter rate fell from 83.1 percent to 33.4 percent against a citywide move from 81.0 percent to 45.0 percent (Section 5b).

f) Average household size rose 4.1 percent here while the citywide figure fell 3.8 percent, over a period when this CPA's housing stock grew at less than half the citywide rate. Household size moved from 2.712 to 2.822 while the citywide figure moved from 2.619 to 2.521 (Section 4a). Total units grew 9.9 percent, from 12,056 to 13,254, against 21.7 percent citywide, with 6 of the CPA's 7 tracts in the units-grew category and 1 in the unit-loss category. The vacancy rate held essentially flat, moving from 2.4 percent to 2.3 percent, while the citywide rate rose from 4.0 percent to 6.6 percent (Section 4a).

g) Three of the CPA's 7 tracts move against its own aggregate age direction. The CPA's under-18 share fell from 25.6 percent to 21.8 percent and its 65-plus share rose from 11.6 percent to 12.7 percent, both slower movements than the citywide shifts from 24.4 percent to 18.8 percent and from 10.6 percent to 14.9 percent (Section 7). Within that aggregate, 27.11 and 29.03 show falling 65-plus shares, at -5.9 and -5.6 percentage points, and 27.02 shows a rising under-18 share, at +2.6 points (Section 7). 27.12 carries the CPA's steepest under-18 decline at -10.6 points, so the aggregate is a net figure across tracts moving against each other rather than a shared trend (Section 7).

Naturally occurring affordable housing. In 2000, 61.11 percent of this community's rentals paying cash rent rented within reach of a household at 60 percent of the county's median family income; in the current period 38.03 percent do, a change of -23.1 points and 823 fewer such rentals, against a citywide share that moved from 55.00 to 27.57 percent (-27.4 points). At 80 percent of median family income the share moved from 87.91 to 70.38 percent, -17.5 points, against a citywide share that moved from 77.12 to 53.05 percent (-24.1 points). The count moved from 4,437 to 4,184 and, because the worst-case treatment of the boundary bracket reverses the sign, the direction of the count change is not stated. These are stock figures: they describe what the rental stock rents for in each period and say nothing about where any household went (Section 8c).

Neighborhood Change: A Verified Compositional Shift Carrying No HCD Signal

All 7 of this CPA's tracts carry zero HCD Neighborhood Change designation of any kind. The Pathway 1A, Pathway 1B, and Pathway 2 counts are each zero, against 28, 9, and 35 tracts citywide; the any-pathway count is zero against 44 of 311 tracts citywide; and the spillover count is zero against 53 citywide (Section 9). That result holds at each of the three geographies examined inside this CPA, with the 3-tract District 4 slice, the 4-tract District 9 slice, and the full 7-tract footprint each returning zero

flags and zero spillover (Section 9). Underneath that uniform zero sits a compositional shift that reproduces from the tract counts: White NH down 41.4 percent (3,253.03 to 1,905) against POC up 30.3 percent (9,145.20 to 11,917) in the District 4 slice the Lab's earlier analysis documented, White NH down 20.6 percent (9,308.89 to 7,387) against POC up 52.5 percent (10,384.85 to 15,840) in the District 9 slice, and White NH down 26.0 percent (12,562 to 9,292) against POC up 42.1 percent (19,530 to 27,757) CPA-wide (Section 2, Section 9). What that establishes is that HCD's standard Neighborhood Change methodology can systematically miss real, substantial racial compositional change: the shift recorded here is large, it has been re-verified independently, it holds at every scale tested within this CPA, and it carries no HCD pathway signal whatsoever. Why the methodology does not register it is not established by this data and is not claimed here; the pattern is recorded as documented and verified, not as explained (Section 9).

Additional Context

Owner-occupied households grew 1.8 percent, from 6,152 to 6,265, while renter-occupied households grew 16.0 percent, from 5,170 to 5,998, against citywide growth of 10.8 percent and 20.8 percent respectively (Section 5a). White NH households fell on both tenures, with renter-occupied loss (-37.7 percent, 1,995 to 1,243) running well ahead of owner-occupied loss (-18.4 percent, 3,909 to 3,189), while Hispanic or Latino renter households grew 117.9 percent, from 1,213 to 2,643, and Asian (alone) owner households grew 99.4 percent, from 599 to 1,195. Black (alone) households declined on both tenures at rates milder than citywide, at -13.0 percent for owners against -28.6 percent citywide and -0.4 percent for renters against -4.6 percent citywide (Section 5a). The Lab's earlier analysis carries tenure-level detail for two tracts: 27.11, where population fell 30.0 percent while owner-occupied households fell 90.2 percent, and 27.05, where population fell 11.1 percent while owner-occupied households fell 79.4 percent (Section 12).

On CalEnviroScreen 5.0, the CPA's population-weighted overall percentile of 62.8 sits well above the citywide 37.1, with population characteristics at 62.3 against 35.7 citywide and pollution burden at 55.2 against 43.6 (Section 10). Traffic runs the other way, at 39.4 against 57.7 citywide, the one sub-metric on which this CPA reads more favorably than the city. Drinking water registers 18.6 against 20.3 citywide and carries the standing drinking-water caution described in the Sources and Methods section. The overall figure is partly concentrated: excluding 27.12, at the 89.4 percentile and 14.3 percent of the CPA's population, moves the weighted average from 62.8 to 58.4, a 4.4-point shift, leaving the CPA's environmental burden elevated above the citywide figure even after the exclusion (Section 10).

Median home value grew 347.1 percent, from $146,879 to $656,655, against 310.9 percent citywide, while median income grew 119.5 percent, from $35,907 to $78,801, against 134.0 percent citywide, and median monthly housing cost grew 156.4 percent, from $790 to $2,026, against 131.6 percent citywide (Section 8a). Crowding is the one measure in this report that tracks the citywide pattern closely at both endpoints, falling from 14.6 percent to 7.7 percent against a citywide move from 12.6 percent to 5.8 percent, with severe crowding falling from 7.3 percent to 2.7 percent against 7.2 percent to 2.4 percent citywide (Section 6). The CPA's tract-highlight scan surfaced age-bracket swings across all 7 tracts alongside zero HCD-flagged tracts and zero RCAA-concentrated tracts (Section 11, Section 12).

These patterns draw on verified Census Bureau data cross-checked against HCD's independently produced Neighborhood Change and Opportunity Map classifications, with the universe filter, the 2000-vintage boundary harmonization, and the rate and median aggregation conventions documented in Section 11. Section 5a's household counts use the ACS "alone" race definition and exclude Other/Two+ NH households, while Sections 2 and 3 use the non-Hispanic-exclusive definition, so the two are not drawn from the same universe, and all 2000 dollar figures are nominal 1999 dollars rather than inflation-adjusted (Section 5a, Section 8a). ACS estimates carry margins of error that widen at the tract level and are not shown in this report's tables, so small CPA-to-city differences should be read as directional rather than precise. The data document patterns of change over time; they do not, on their own, establish why an individual household left a given tract, and they do not establish the mechanism behind HCD's non-detection of the compositional shift documented above.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

2. Population (2000 → Current)

	CPA 2000	CPA Current	Δ	City 2000	City Current	Δ
Total	32,092	37,049	+15.4%	1,184,838	1,351,501	+14.1%
White NH	12,562	9,292	-26.0%	578,087	549,251	-5.0%
POC	19,530	27,757	+42.1%	606,751	802,250	+32.2%

This CPA's total population grew slightly faster than the city (+15.4% vs. +14.1%), but its underlying racial composition shifted far more sharply: White NH population fell 26.0 percent here against a 5.0 percent citywide decline, while POC population grew 42.1 percent here against 32.2 percent citywide (Section 1). This is the CPA-wide figure across all 7 tracts; see Section 9 for the decomposition against the Lab's earlier finding, which was documented for this CPA's 3-tract District 4 slice only.

3. Population by Race Breakdown

Category	CPA 2000	CPA Current	CPA Δ	City 2000	City Current	City Δ
Asian NH	4,008	6,574	+64.0%	161,444	237,181	+46.9%
Black NH	5,370	4,990	-7.1%	88,855	68,939	-22.4%
Hispanic or Latino	8,135	14,145	+73.9%	304,758	404,143	+32.6%
Other/Two+ NH	2,017	2,048	+1.5%	51,695	91,987	+77.9%
White NH	12,562	9,292	-26.0%	578,087	549,251	-5.0%

Black NH population in this CPA fell only 7.1 percent, far more mildly than the citywide decline of 22.4 percent – the opposite pattern from White NH, which fell more than five times as fast here as citywide. Hispanic or Latino population nearly doubled its citywide growth rate (+73.9% vs. +32.6%), consistent with this CPA absorbing a large share of its population growth through that category specifically.

4a. Housing Units & Households (2000 → Current)

Metric	CPA 2000	CPA Current	CPA Δ	City 2000	City Current	City Δ
Total units	12,056	13,254	+9.9%	460,671	560,804	+21.7%
Occupied units	11,762	12,944	+10.0%	442,094	523,840	+18.5%
Vacant/Unoccupied units	294	310	+5.5%	18,577	36,964	+99.0%
of which: Seasonal/Recreational/Occasional Use	14	10	-26.3%	5,785	9,999	+72.9%
Vacancy rate	2.4%	2.3%	-0.1pp	4.0%	6.6%	+2.6pp
Avg household size	2.712	2.822	+4.1%	2.619	2.521	-3.8%

Change categories across this community's tracts, 2000 to current: 6 units grew, 1 lost units – no tract in this CPA falls into the stable category or the occupancy-pattern-change category, a narrower spread than most communities the Lab has reported. This CPA's vacancy rate is essentially unchanged and remains far below the city's (2.3% vs. 6.6% currently), and its average household size rose (+4.1%) while the city's fell (-3.8%) – the opposite direction from the citywide trend, and unusual among the CPAs examined in the Lab's Mid-City set.

4b. Housing Production (6th RHNA Cycle)

The current RHNA cycle began in April 2021. This section reports housing units that reached the Permitted phase of HCD's Annual Progress Report (Table A2) framework from that date forward, the stage at which a project has cleared entitlement and received a building permit. Figures are drawn directly from HCD's own APR submissions, reconciled against the Lab's tract-level geography and opportunity classifications.

> Of the 2,331 below-moderate-income units permitted in High and Highest Resource tracts citywide during the current RHNA cycle, Mid-City:Eastern Area's own High and Highest Resource tracts accounted for 0, or 0.0%.

Units Permitted, 6th Cycle Summary (April 2021 to Present)

Metric	Mid-City:Eastern Area	City of San Diego	Geography Share
Existing housing stock (all in-city tracts)	13,254	568,857	2.3%
Total units permitted	337	35,482	0.9%
Above Moderate income	309	28,771	1.1%
Below Moderate income (deed-restricted)	28	6,711	0.4%
Units permitted per 1,000 existing units	25.4	62.4	–
Below-moderate units permitted per 1,000 existing	2.1	11.8	–

Source: HCD Annual Progress Report Table A2, Permitted phase, reconciled to the Lab's tract geography. Below-moderate income includes Acutely Low, Extremely Low, Very Low, Low, and Moderate income tiers combined; in this dataset every below-moderate unit permitted is deed-restricted, so the two figures are not independent counts. Existing housing stock is counted over all in-city census tracts with no group-quarters exclusion, a slightly wider universe than the household and demographic figures in Section 4a and elsewhere, which exclude group-quarters-heavy tracts. Production is a count of construction rather than a household rate, so the group-quarters exclusion that protects household measures does not apply to it. 2025 figures are drawn from the most recent HCD APR submission on file and may not reflect a full calendar year of reporting. Unit-type categories in the table below are HCD's own Table A2 classifications and are not independently re-derived by the Lab.

Units Permitted by Year, Mid-City:Eastern Area

Year	Total Units Permitted	Below-Moderate Units
2018	13	0
2019	23	0
2020	32	2
2021	59	0
2022	26	0
2023	88	3
2024	80	7
2025	99	18

2018-2020 predate the current RHNA cycle and are shown for trend context only; the 6th-cycle production summary above uses only permits dated April 2021 forward.

Units Permitted by Type

Year	SFD	2 to 4	ADU	Total
2018	0	0	13	13
2019	0	0	23	23
2020	0	4	28	32
2021	0	0	59	59
2022	2	0	24	26
2023	0	0	88	88
2024	1	0	79	80
2025	0	0	99	99

SFD: single-family detached. SFA: single-family attached. “2 to 4”: duplex through fourplex. “5+”: multifamily buildings of five units or more. ADU: accessory dwelling unit. MH: mobile home. Categories are HCD’s own Table A2 classifications and are not independently re-derived by the Lab. Row totals reconcile exactly to the year-by-year totals in the table above. 2025 figures may not reflect a full calendar year of reporting.

The City of San Diego’s 2025 Baker Settlement commits the City to include data demonstrating that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. The settlement counts projects; the figures here count units, so they are a companion measure and not the settlement’s own. Citywide, 51.6% of below-moderate units permitted during the current RHNA cycle have landed in those tiers. Mid-City:Eastern Area’s own below-moderate units permitted in Moderate, High, or Highest Resource tracts stand at 0.0%.

5a. Households by Race x Tenure (2000 → Current)

Mid-City:Eastern Area – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	599	1,195	+596	+99.4%
Black (alone)	644	561	-83	-13.0%
Hispanic or Latino	999	1,320	+321	+32.1%
White NH	3,909	3,189	-720	-18.4%
Four-race subtotal	**6,152**	**6,265**	**+113**	**+1.8%**
Not covered	148	526	–	–
Household total	**6,300**	**6,791**	**+491**	**+7.8%**

Mid-City:Eastern Area – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	509	666	+157	+30.8%
Black (alone)	1,452	1,446	-6	-0.4%
Hispanic or Latino	1,213	2,643	+1,430	+117.9%
White NH	1,995	1,243	-752	-37.7%
Four-race subtotal	**5,170**	**5,998**	**+828**	**+16.0%**
Not covered	292	155	–	–
Household total	**5,462**	**6,153**	**+691**	**+12.7%**

City of San Diego – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	24,172	48,159	+23,987	+99.2%
Black (alone)	11,124	7,948	-3,176	-28.6%
Hispanic or Latino	27,478	43,704	+16,226	+59.1%
White NH	152,986	139,318	-13,668	-8.9%
Four-race subtotal	**215,760**	**239,129**	**+23,369**	**+10.8%**
Not covered	4,827	10,722	–	–
Household total	**220,587**	**249,851**	**+29,264**	**+13.3%**

City of San Diego – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	22,271	36,133	+13,862	+62.2%
Black (alone)	21,734	20,730	-1,004	-4.6%
Hispanic or Latino	49,980	76,480	+26,500	+53.0%
White NH	119,064	123,964	+4,900	+4.1%
Four-race subtotal	**213,049**	**257,307**	**+44,258**	**+20.8%**
Not covered	8,459	16,682	–	–
Household total	**221,508**	**273,989**	**+52,481**	**+23.7%**

Black/Asian use the ACS "alone" definition here, not the NH-exclusive definition used in Section 3 – not directly comparable across the two sections. Black (alone) households declined on both tenures in this CPA (owner -13.0%, renter -0.4%), a far milder decline than the city's Black owner households (-28.6%), and renter-side losses are nearly flat here (-0.4%) where the city shows Black renters also declining (-4.6%). White NH households declined on both tenures here, with renter-occupied loss (-37.7%) far outpacing owner-occupied loss (-18.4%) – household counts are not on the same base as Section 3's population-level White NH decline (-26.0%) and are not directly comparable figure-for-figure. These four race categories do not sum exactly to Section 4a's occupied-unit totals – the race-by-tenure source excludes Other/Two+ NH households.

"Not covered" is the household total less the four categories printed above it, as printed. The categories come from a different Census table than the total and the 2000 values are allocated onto current tract boundaries, so the difference can fall below zero; where it does the cell is not stated. The row is the net of households the four categories omit and households they count twice, not a category, and no rate of change is computed on it.

5b. Mobility

Mobility (% Moved in Last 5 Years)

Metric	CPA 2000	CPA Current	City 2000	City Current
Owner	32.4%	16.0%	37.0%	14.5%
Renter	83.1%	33.4%	81.0%	45.0%

This CPA's current owner mobility (16.0%) sits slightly above the city's (14.5%).

Mobility (% Moved in Last 2 Years)

Metric	CPA 2000	CPA Current	City 2000	City Current
Owner	10.6%	0.1%	12.0%	1.8%
Renter	42.1%	6.1%	41.4%	10.0%

Source: American Community Survey, year the householder moved into the unit. 2013 is omitted entirely, not shown as zero: no bracket finer than ~4 years exists in the ACS 2009-2013 5-year vintage, so both figures are empty for every tract in this CPA and citywide in 2013. This CPA's current owner 2yr-mover rate (0.1%) is strikingly low, well below the already-low citywide rate (1.8%).

6. Crowding

Metric	CPA 2000	CPA Current	CPA Δ	City 2000	City Current	City Δ
% Crowded	14.6%	7.7%	-6.9pp	12.6%	5.8%	-6.8pp
% Severely Crowded	7.3%	2.7%	-4.5pp	7.2%	2.4%	-4.7pp

This CPA's crowding profile tracks the city closely at both endpoints and on both measures – unlike several other findings in this report, crowding here shows no CPA-specific divergence worth flagging.

7. Age Composition (2000 → Current)

Bracket	CPA 2000	CPA Current	City 2000	City Current
Under 18	25.6%	21.8%	24.4%	18.8%
18-34	32.2%	29.9%	29.0%	28.4%
35-64	30.6%	35.5%	36.0%	37.9%
65+	11.6%	12.7%	10.6%	14.9%

This CPA's under-18 share fell only 3.8 percentage points, about two thirds of the city's 5.6-point drop, and its 65+ share rose only 1.2 points against the city's 4.3-point rise – this CPA is aging more slowly than the city on both ends of the age distribution, the opposite pattern from the companion Mid-City:City Heights report.

Per-tract age-bracket swings, by district slice (2000 → Current):

Tract	District	<18 share 2000 → Current	<18 Δ	65+ share 2000 → Current	65+ Δ
27.12	D4	33.3% → 22.6%	**-10.6pp**	11.4% → 12.5%	+1.0pp
27.03	D9	26.5% → 22.0%	-4.5pp	9.4% → 14.4%	+5.1pp
29.02	D9	17.1% → 12.7%	-4.4pp	12.1% → 14.0%	+1.9pp
27.05	D4	27.3% → 24.5%	-2.8pp	13.6% → 20.5%	+6.8pp
27.11	D4	32.9% → 30.6%	-2.3pp	11.3% → 5.4%	**-5.9pp**
29.03	D9	25.2% → 23.2%	-2.0pp	14.7% → 9.1%	**-5.6pp**
27.02	D9	19.0% → 21.5%	**+2.6pp**	10.0% → 10.4%	+0.4pp

Two of this CPA's 7 tracts (27.11 and 29.03) show a falling *65+ share, and one tract (27.02) shows a* rising *under-18 share – three tracts running against this CPA's own aggregate direction, out of only 7 total. This CPA does not show the uniform-direction pattern documented for Mid-City:City Heights' 15 tracts. 27.05 and 27.11 are two of the three tracts in the Lab's earlier District 4 analysis – see Section 9 for the full writeup.*

8a. Economic Trend (Population-Weighted Medians)

Metric	CPA 2000	CPA Current	CPA Δ	City 2000	City Current	City Δ
Income	$35,907	$78,801	+119.5%	$50,274	$117,634	+134.0%
Home value	$146,879	$656,655	+347.1%	$226,860	$932,173	+310.9%
Monthly cost	$790	$2,026	+156.4%	$1,079	$2,499	+131.6%

This CPA's home value grew faster than the city's (+347.1% vs. +310.9%) while its income grew more slowly (+119.5% vs. +134.0%) – home values in this CPA outpaced income growth by a wider margin than citywide, consistent with the home-value/income gap shown in Section 8b, which is less negative here (-3.9 points) than citywide (-4.2). 2000 figures are nominal 1999 dollars, not inflation-adjusted – see the Sources and Methods section for the nominal-dollars caveat, which applies identically here.

8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change)

	Mid-City:Eastern Area	City of San Diego	Regional Threshold
Income change 2000-2023	115.5% (ABOVE)	126.1% (ABOVE)	50th pctile: 109.3%
Rent change 2013-2023	61.8% (below)	64.8% (ABOVE)	50th pctile: 64.5%
Home value/income gap	-3.9pp (below 25pp)	-4.2pp (below 25pp)	flat 25pp

This CPA crosses only the income-growth threshold (1 of 3 HCD indicators), a narrower profile than the citywide pattern of crossing 2 of 3. This is a notable contrast with Section 9's HCD Neighborhood Change pathway finding: this CPA crosses fewer of HCD's own rate-of-change thresholds than the city overall, on top of carrying zero pathway flags across all 7 tracts – see Section 9 for the full discussion.

8c. Naturally Occurring Affordable Housing

A rental counts as affordable here when its gross rent is at or below 30 percent of a stated share of HUD's median family income for San Diego County, divided by twelve. At 60 percent of median family income the threshold was $805.50 a month in 2000 and is $1,792.50 in the current period; at 80 percent, $1,074.00 and $2,390.00. No subsidy status, building age or covenant enters the test: it is a rent test on the whole rental stock, which is what "naturally occurring" means. The denominator is renter-occupied homes paying cash rent. **Units, not households**: the Census reports what a home rents for, not who lives in it.

Rentals affordable at 60 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:Eastern Area	7	5,047	3,084	61.11%	5,945	2,261	38.03%	-23.1	-10.6	-823	-91
City of San Diego	311	212,529	116,897	55.00%	268,003	73,894	27.57%	-27.4	-18.2	-43,004	-18,621

Rentals affordable at 80 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:Eastern Area	7	5,047	4,437	87.91%	5,945	4,184	70.38%	-17.5	-8.2	4,437 to 4,184 (see note)	see note
City of San Diego	311	212,529	163,898	77.12%	268,003	142,181	53.05%	-24.1	-15.3	-21,717	-405

Census 2000 (SF3 table H062, harmonised to 2020 tract boundaries) against ACS 2020-2024 (table B25063). Where a threshold falls inside a published rent bracket, the units in that bracket are counted in proportion to where the threshold sits. **Change** is the current share minus the 2000 share as printed, in points; it recomputes from the two shares beside it on every row. **Floor** is the change in share when every unit in the boundary bracket is counted as affordable now and none of them in 2000, so it is the figure that survives an adversarial reading. **Change, worst case** applies the same treatment to the count. Figures sum units across member tracts and then divide; no figure is an average of tract shares. Every row is the 311-tract household universe described at the top of this report, so the community, district and city rows are comparable with each other. Mid-City:Eastern Area at 80 percent: the point estimate is -253 homes and the worst-case treatment of the boundary bracket is +272, so the direction of change is not established and both years' counts are stated instead. Every other row holds its direction under either treatment.

Tract detail. A tract share is stated only where it survives three rules: at least 100 rentals paying cash rent in both years, a coefficient of variation (CV) at or under 30 percent on the rent bracket containing the threshold, and a low-to-high band no wider than 25 points. Where it does not, the count stands alone and the reason is given. The current-period rent brackets are $500 wide above $1,500 and both thresholds fall inside one, which is why most tract shares carry bands too wide to state; the community is the reportable unit. Do not restore a suppressed share from the counts.

Tract detail at 60 percent, 7 tracts, 0 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
27.02	685	238	not stated	CV 31
27.03	552	612	not stated	CV 40; band 45 pts
27.05	161	314	not stated	CV 93
27.11	408	33	not stated	CV 61; 2000 reallocated from more than one source tract
27.12	348	526	not stated	band 42 pts
29.02	682	433	not stated	band 41 pts
29.03	249	106	not stated	CV 43; 2000 reallocated from more than one source tract

Tract detail at 80 percent, 7 tracts, 0 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
27.02	1,156	772	not stated	band 49 pts
27.03	821	956	not stated	CV 43
27.05	225	397	not stated	CV 47
27.11	515	296	not stated	band 54 pts; 2000 reallocated from more than one source tract
27.12	436	665	not stated	CV 106
29.02	923	860	not stated	CV 33
29.03	362	238	not stated	CV 34; band 30 pts; 2000 reallocated from more than one source tract

These are stock figures. They say how much of the rental stock rents below a threshold; they do not say where anyone went or why, and setting them beside growth figures describes two things happening at once rather than one causing the other. Deed-restricted homes renting below the threshold are inside these counts, not subtracted from them. Where a 2000 count is marked as reallocated, that tract's 2000 figure is an estimate allocated from more than one 2000 census tract onto the current boundary. Reference incomes are HUD's median family income for San Diego County, $53,700 for fiscal year 2000 and $119,500 for fiscal year 2024; each threshold is 30 percent of the stated share of that income, divided by twelve.

9. Supplementary Context

HCD Opportunity Tier

Source: California HCD 2026 Opportunity Map. The opportunity score is a 0-9 ordinal tier (0-3 Low Resource, 4-5 Moderate, 6-7 High, 8-9 Highest), not a percentile.

Tier	Mid-City:Eastern Area	City of San Diego
Highest Resource	0	117
High Resource	0	53
Moderate Resource	0	45
Low Resource	7	95
Unclassified	0	1
Total tracts	**7**	**311**
Mean opportunity score (0-9, wtd)	1	5
Environmental burden flag (tract count)	0	23
High-poverty & segregation flag (tract count)	0	3

Every tract in this CPA is Low Resource, the same uniform profile as the companion Mid-City:City Heights report.

HCD Neighborhood Change Pathway Flags

Pathway	Mid-City:Eastern Area	City of San Diego
Pathway 1A	0	28
Pathway 1B	0	9
Pathway 2	0	35
Any Pathway	0	44
Spillover	0	53
Total tracts	**7**	**311**

Every one of this CPA's 7 tracts carries zero HCD Neighborhood Change designation of any kind – no pathway flag and no spillover. This finding is the direct subject of the Lab's earlier District 4 analysis, addressed in full immediately below.

Racial Concentration of Affluence (RCAA)

Reported per the Lab's two-subtotal convention: RCAA-concentrated (Persistent + Reinforcing/Intensifying + Newly RCAA) and diversifying/opening (Converging High-Opportunity + Diversifying Affluent) are reported as separate subtotals, never combined.

	Mid-City:Eastern Area	City of San Diego
RCAA-concentrated subtotal	0	26
Diversifying/opening subtotal	0	28
None	7	257
Total tracts	**7**	**311**

This CPA carries zero tracts in either subtotal. The RCAA screen is the top 20 percent of county tracts on a composite of income, home value and housing cost together with the bottom 20 percent on people-of-color share; this CPA's highest-ranked tract sits at the 40th percentile on affluence and its lowest at the 51st on people-of-color share, so no tract here is near the screen.

A Confirmed, CPA-Wide Instance of HCD's Detection Gap

This is Mid-City:Eastern Area's most significant earlier finding, and the reason this CPA carries particular analytical weight in the Lab's broader argument. The Lab's earlier analysis documented, for this CPA's 3-tract District 4 slice only (27.05, 27.11, 27.12), a White NH population decline of -41.4 percent (3,253 to 1,905) alongside POC growth of +30.3 percent, carrying **zero** HCD Neighborhood Change pathway flags of any kind – a swing that analysis described as larger than several other documented District 4 corridor tracts, yet invisible to HCD's own detection methodology. **Both of those figures reproduce exactly from the tract counts here: White NH 3,253.03 to 1,905 (-41.4%), POC 9,145.20 to 11,917 (+30.3%).** The zero-pathway-flag status for these 3 tracts also reproduces exactly (Section 9, above, and this CPA's own 7-tract total).

This CPA's full 7-tract footprint extends the finding rather than diluting it. The District 9 half of this CPA (29.02, 29.03, 27.02, 27.03) shows White NH population falling from 9,308.89 to 7,387 (-20.6%) and POC growing from 10,384.85 to 15,840 (+52.5%) – a comparable direction to the D4 slice, though a milder White NH decline and a steeper POC gain, first documented in the Lab's Council District 9 report and reproduced exactly here. **Both district slices carry zero HCD pathway flags, and the CPA-wide total confirms it: all 7 tracts, zero flags, zero spillover** (this section, above). The CPA-wide compositional shift (Section 2) is White NH -26.0 percent (12,562 to 9,292) and POC +42.1 percent (19,530 to 27,757) – a real, verified, CPA-wide racial compositional shift, entirely undetected by HCD's Neighborhood Change pathway methodology at any geographic level tested: the original 3-tract D4 slice, the 4-tract D9 slice, and the full 7-tract CPA.

This is evidence that HCD's standard methodology can systematically miss real, substantial compositional change, even when that change is among the most pronounced racial shifts documented anywhere in the Lab's coverage. The mechanism behind why HCD's pathway methodology does not flag this CPA is not established by this data and is not claimed here; what is established is that the compositional shift is real, it is large, it holds at each of the three geographies examined within this CPA, and it carries no HCD pathway signal whatsoever. This is this report's central analytical contribution.

Cross-Cluster Context: Southeast Communities

All 7 of this CPA's tracts sit inside the Lab's Southeast Communities cluster (53 tracts across six community planning areas), meaning every figure in this report is a subset of that broader cluster's geography, not an independent sample. The cluster report itself is a city-only comparison (District 4 holds a 54.7% majority with real minority blocks in District 9 and District 8), the same comparison structure this CPA-tier report also uses, for a related but distinct reason – this CPA's own district split (57.14% D9 / 42.86% D4) has no negligible minority to drop, unlike the cluster's own composition question. Readers consulting the Lab's earlier SR-94 corridor cluster report for this geography should note that cluster was deprecated and its membership, including this CPA, redistributed to the Southeast Communities cluster; the archived cluster's figures should not be treated as current.

Community Plan Update Context

These findings are produced in the context of the City of San Diego's ongoing Mid-City Communities Community Plan Update. The patterns most directly relevant to this CPA are displacement pressure and racial compositional change: this CPA's White NH population fell 26.0 percent while POC population grew 42.1 percent (Section 2), a shift that the Lab's earlier analysis and this report together show is real, substantial, and entirely undetected by HCD's own Neighborhood Change pathway methodology at every geographic scale tested within this CPA (this section, above). Ownership patterns compound the picture: White NH owner-occupied households fell 18.4 percent and renter-occupied households fell 37.7 percent over the same period (Section 5a), while owner mobility has nearly stopped entirely in the current period (a 0.1 percent 2-year mover rate, Section 5b). Without making a causal claim the data cannot support, the plan update is a concrete opportunity under AB 686 and the City's AFFH obligations to affirmatively address the fair housing patterns documented in this report, including the specific methodological blind spot this CPA's data exposes – the data documents the condition; the plan update is the policy moment.

10. Climate Equity

Source: CalEnviroScreen 5.0. Percentiles are on a 0-100 scale; higher means greater burden/vulnerability.

Metric	Mid-City:Eastern Area (wtd)	City of San Diego (wtd)
CES 5.0 overall percentile	62.8	37.1
Pollution burden percentile	55.2	43.6
Population characteristics percentile	62.3	35.7
Traffic percentile	39.4	57.7
Drinking water percentile	18.6	20.3

This CPA's overall CES percentile (62.8) sits well above the city's (37.1), though its traffic percentile (39.4) sits below the citywide figure (57.7) – the only sub-metric here where this CPA is more favorable than the city. Concentration check: the top tract, 27.12, carries a CES percentile of 89.4 and holds 14.3% of the CPA's population – a larger population share than any single top tract identified in the Lab's other Mid-City reports. Excluding it shifts the population-weighted average by 4.4 points (62.8 → 58.4), a real and comparatively larger effect than the small shifts seen elsewhere, though the CPA's environmental burden remains elevated above the city even after exclusion. Drinking water percentile carries the standing drinking-water caution described in the Sources and Methods section.

11. Sources and Methods

Data sources. U.S. Census Bureau: the 2000 Decennial Census (Summary File 3) and the American Community Survey five-year estimates for 2020-2024, with the 2009-2013 estimates shown as a middle point where a 2013 column appears. California HCD's 2026 Opportunity Map and Neighborhood Change methodology. HCD Annual Progress Report Table A2 for housing production. CalEnviroScreen 5.0. HUD median family income for San Diego County, fiscal years 2000 and 2024, for Section 8c.

Geography and the citywide basis. Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced. Census tracts are on 2020 boundaries; 2000 figures are allocated onto them through the Census Bureau's tract relationship files, and where a current tract draws on more than one 2000 tract its 2000 figure is an estimate. Section 4b's production figures are the one exception to the 311-tract basis: production is a count of construction rather than a household rate, so its existing-stock denominator uses all in-city tracts with no group-quarters exclusion.

Comparison columns. This community's 7 census tracts are split 4 in Council District 9 (57.14 percent) and 3 in Council District 4 (42.86 percent). Neither block is negligible, so the report compares the community with the city only and carries no district column.

How figures are aggregated. Rates sum numerators and denominators across tracts before dividing. Medians (income, home value, monthly housing cost) are population-weighted averages of tract medians. Section 8c sums rental units across tracts and then divides. No figure in this report is an average of tract shares.

Dollars. 2000 dollar figures are nominal 1999 dollars, not inflation-adjusted. The 2000 median monthly housing cost carries a reliability caution and should be read as indicative.

Race categories. Sections 2 and 3 use non-Hispanic-exclusive categories: White NH, Black NH, Asian NH and Other/Two+ NH are non-Hispanic, and Hispanic or Latino is any race. Section 5a's Black and Asian householders use the Census "alone" definition, which is not restricted to non-Hispanic, so Section 5a is not drawn from the same universe as Sections 2 and 3 and the two cannot be differenced against each other.

Income change measured two ways. Section 8a reports the change in the population-weighted median household income from 2000 to the current period. Section 8b reports HCD's own rate-of-change measure over HCD's periods (2000-2023 for income, 2013-2023 for rent) against HCD's regional thresholds. The two use different series and periods and are not expected to agree. HCD publishes its rate-of-change values as fractions; they are multiplied by 100 to read as percentages, confirmed against HCD's own methodology, and the same conversion is applied in every Lab report.

Racially concentrated areas of affluence. A tract meets the RCAA screen when it sits in the top 20 percent of San Diego County tracts on a composite of median income, median home value and median monthly housing cost, and in the bottom 20 percent on the share of residents who are people of color,

each ranked within its own period. Tracts meeting the screen are Persistent, Newly or Reinforcing/Intensifying RCAA by how they moved between periods; Converging High-Opportunity (High or Highest Resource tracts becoming more representative) and Diversifying Affluent (affluent tracts no longer meeting the screen) are not RCAA. RCAA figures follow a two-subtotal convention: the concentrated subtotal (Persistent, Reinforcing/Intensifying and Newly RCAA) is reported separately from the diversifying subtotal (Converging High-Opportunity and Diversifying Affluent), and the two are never summed into one total, because they point in opposite directions.

Drinking water percentile. CalEnviroScreen's drinking water indicator carries a standing caution in the Lab's data-quality log: it reads as a near-constant value across most of the city, so differences on that one measure should not be read as confirmed.

Tract highlights. Section 12's tract list comes from a scan of every tract in the community for four signals: the largest age-bracket percentage-point swings from 2000 to the current period, any HCD Neighborhood Change pathway flag, any RCAA classification, and any earlier tract-level analysis by the Lab. For this community the scan surfaced age-bracket swings across all 7 tracts (Section 7) but zero HCD-flagged tracts and zero RCAA-concentrated tracts – consistent with Section 9's central finding that this CPA's real compositional change carries no HCD signal.

Documents cited in this report. This report is Appendix 2 to the Mid-City Communities Fair Housing Review (San Diego Fair Housing Lab, 2026), which reads the four community reports together against the draft Mid-City Communities Plan. Its companions are the City Heights, Kensington-Talmadge and Normal Heights community reports. The following Lab working documents are referred to in the text and are not published; the methods they carry are restated above.

- The Lab's Council District 9 report: cited in Section 9.
- The Lab's earlier SR-94 corridor cluster report: cited in Section 9.

12. Tract-Level Detail

The tracts below are the ones the highlight scan (Section 11) surfaced. Three of this CPA's tracts (27.05, 27.11, 27.12) were the subject of the Lab's earlier District 4 analysis, and one (27.11) of its tenure-conversion analysis; Section 9 above carries the CPA-level synthesis. None has yet been the subject of its own tract-level report, and the notes record what the scan found so that a future one starts from them.

Notable tracts

- **27.12** – the CPA's steepest under-18 decline (-10.6pp) and its environmental-concentration top tract (CES 89.4 percentile, 14.3% of the CPA's population). No HCD pathway flag, no RCAA classification.
- **27.11** – the CPA's steepest 65+ decline (-5.9pp), running against this CPA's own aggregate aging direction. Already analyzed at tenure-detail level in the Lab's earlier work (renter share rose to 61.9% by the current period not through renter growth but because owner units were lost roughly four times faster than renter units) and in its race/tenure decomposition (owner-occupied Black households collapsing far faster than population decline: population -30.0%, owner-occupied -90.2%). No RCAA classification.
- **27.05** – the CPA's largest 65+ rise (+6.8pp). Also analyzed in the Lab's earlier tenure decomposition (population -11.1%, owner-occupied -79.4%). No HCD pathway flag, no RCAA classification.
- **29.03** – the CPA's second-steepest 65+ decline (-5.6pp), one of only two tracts in this CPA showing a falling 65+ share. This is the District 9 half of the CPA, outside the District 4 slice the earlier analysis covered. No HCD pathway flag, no RCAA classification; a candidate for future investigation as a possible second instance of the tenure-conversion pattern documented in the CPA's District 4 slice.

The age-composition swings of these four tracts (as distinct from the tenure-level analysis of two of them) have not been checked against permit or development records or any other independent source, and the tracts are named here as candidates for a future tract-level report rather than built out in this one.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

Terms used in this document

Census tract
A small statistical area the Census Bureau uses to report data, usually holding between 1,200 and 8,000 people. San Diego's city limits contain 311 of them in this analysis, 30 of which sit inside the Mid-City plan boundary. It is the smallest geography at which the figures in this review can be reported.

Community planning area (CPA)
The City of San Diego's own neighborhood planning boundaries. City Heights, Eastern Area, Kensington-Talmadge and Normal Heights are each one, and together they make up the Mid-City Communities Plan boundary. Every figure here that names a neighborhood uses these official boundaries.

Opportunity tier
A four-level ranking published by California's housing department and tax credit committee, placing every census tract in the state in Low, Moderate, High or Highest Resource based on measures of education, economic conditions and environment. It is the State's classification, not this organization's.

Low Resource
The lowest of the State's four opportunity tiers. Twenty-three of the thirty tracts in the Mid-City plan boundary sit here, against 95 of 311 citywide.

Moderate Resource
The second of the State's four opportunity tiers. Six Mid-City tracts sit here.

High Resource
The third of the State's four opportunity tiers. One Mid-City tract sits here, in Normal Heights.

Highest Resource
The top of the State's four opportunity tiers. No tract inside the Mid-City plan boundary sits here; 117 tracts citywide do.

Neighborhood change area
A tract carrying one of the State's Neighborhood Change pathway designations, its marker for a historically lower-income community of color that has since seen substantial racial and economic change. Nine of the thirty Mid-City tracts carry one, against 44 of 311 citywide.

Neighborhood Change pathway
The State's method for identifying neighborhood change, published in 2026. A tract can qualify under Pathway 1A, 1B or 2, each testing a different combination of historical condition, demographic change and housing-cost pressure. This review refers to a tract carrying any of them as a neighborhood change area.

Rate-of-change threshold
Part of the State's neighborhood change method. A tract is tested against regional benchmarks for how fast its income, its racial composition and its rents have moved. The rent benchmark for the San Diego region is 64.5 percent growth since 2013.

Racially Concentrated Area of Affluence (RCAA)
A neighborhood where high-income, predominantly non-Hispanic White households are concentrated well above the regional norm. State law now requires every California jurisdiction's housing element to analyse these areas specifically. One tract inside the Mid-City plan boundary carries this classification.

Persistent RCAA
A tract classified as a Racially Concentrated Area of Affluence at every point measured, rather than one that has recently become or ceased to be one. Tract 20.01 in Kensington-Talmadge is District 9's only one.

RECAP
A Racially and Ethnically Concentrated Area of Poverty, the counterpart to an RCAA. The City's own Housing Element Fair Housing Appendix places two City Heights tracts inside its RECAP cluster.

Affirmatively furthering fair housing (AFFH)
The legal duty, under California Government Code section 8899.50 and AB 686, to take meaningful actions that overcome patterns of segregation and foster inclusive communities, rather than simply avoiding discrimination. It applies to a community plan update as it does to a housing element.

AB 686
A 2018 California law, effective 2019, requiring every housing element to include a data-driven, geographically specific analysis of segregation patterns, disparities in access to opportunity and concentrated poverty, and to set goals and actions addressing what that analysis finds.

AB 1304
A 2021 California law, in effect from 2022, that sharpened AB 686 by requiring every housing element's fair housing analysis to identify racially or ethnically concentrated areas of affluence as well as of poverty, and to show how the sites the jurisdiction plans for housing affirmatively further fair housing. It applies statewide.

Baker Settlement
A binding commitment the City of San Diego entered in March 2025, agreeing to show that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. It is a reporting duty rather than a requirement to build, and it counts projects rather than homes.

CalEnviroScreen
California's tool for scoring cumulative pollution burden and community vulnerability, reported as a statewide percentile from 0 to 100. A higher number means greater burden. City Heights sits at 74.0 against a citywide 37.1.

RHNA
The Regional Housing Needs Allocation, the State's assignment to each jurisdiction of how many homes it must plan for, by income level, over an eight-year cycle.

Capacity
What a plan's land use map would allow to be built, if every site that could redevelop did. It is not a forecast of what will be built, and this review does not treat it as one. The draft does not publish capacity by community planning area.

Permitted
A home the City has authorised. It is not yet a home that exists. This review reports production as permitted or as completed and never computes a rate between the two.

Completed
A home that has been built and finished, as distinct from one that has been permitted.

Below-moderate housing
Homes permitted at any affordability level other than above-moderate: the moderate tier and every tier below it. In practice these are deed-restricted affordable units. This review reports it as units permitted per 1,000

existing homes so communities of different sizes can be compared.

Deed-restricted

A home carrying a legal restriction that keeps it affordable to households at a stated income level for a set period, rather than one that happens to be inexpensive at the moment.

Accessory dwelling unit (ADU)

A small secondary home on a lot that already has a house, sometimes called a granny flat or backyard unit. About seven in ten housing permits in Mid-City are for these, against about two in ten citywide.

Suitable sites inventory

The list of parcels a jurisdiction identifies as able to accommodate its assigned housing need. The City's own inventory places 36.3 percent of its suitable sites inside areas it identifies as carrying displacement risk.

Crowding

A household living at more than one person per room. City Heights' rate is 15.7 percent against a citywide 5.8 percent.

Growth gap

The difference between a community's housing unit growth and its population growth, in percentage points. A positive gap means units were added faster than people arrived. Two of the four Mid-City communities added housing while losing population, and three of the four added housing faster than people arrived.

Displacement risk area

A geography the City's own Housing Element Fair Housing Appendix identifies as carrying elevated risk that lower-income residents will be pushed out. All four Mid-City communities appear in the City's lists.

Margin of error

The range within which a survey estimate is likely to fall. American Community Survey figures for small areas carry wide margins, which is why this review reports some measures at community level rather than tract level.

Kensington-Talmadge Community Fair Housing Report

Appendix 3 to the Mid-City Communities Fair Housing Review

Prepared by San Diego Fair Housing Lab
Date September 2026
Mid-City Communities Plan Update, September 2026

Contents

About this report 3
1. Narrative 4
2. Population (2000 → Current) 7
3. Population by Race Breakdown 8
4a. Housing Units & Households (2000 → Current) 9
4b. Housing Production (6th RHNA Cycle) 10
5a. Households by Race x Tenure (2000 → Current) 12
5b. Mobility 14
6. Crowding 15
7. Age Composition (2000 → Current) 16
8a. Economic Trend (Population-Weighted Medians) 17
8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change) 18
8c. Naturally Occurring Affordable Housing 19
9. Supplementary Context 21
10. Climate Equity 23
11. Sources and Methods 24
12. Tract-Level Detail 26
Terms used in this document 27

About this report

Mid-City Communities Plan Update. Community planning area: Mid-City:Kensington-Talmadge. Appendix 3 to the Mid-City Communities Fair Housing Review. San Diego Fair Housing Lab, 2026.

How to read the City of San Diego columns. Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced.

How to read the comparison columns. All 4 of this community's census tracts sit in Council District 9, so the report compares the community with District 9 and with the city. The District 9 column is the whole district, not only this community's part of it.

This report covers demographic, housing and economic change from 2000 to the current period (American Community Survey 2020-2024) for one of the four communities in the Mid-City Communities Plan Update, with companion reports for City Heights, Eastern Area and Normal Heights. Sources and methods are set out in Section 11.

1. Narrative

This report examines demographic, housing, and economic change in the Mid-City:Kensington-Talmadge community planning area from 2000 to the current period, comparing the CPA against both District 9 and the citywide baseline, drawing on U.S. Census Bureau data (2000 Decennial Census and American Community Survey) together with California HCD's Neighborhood Change and Opportunity Map methodologies. All 4 of this CPA's tracts sit in District 9, so the district column is a like-for-like comparison rather than a partial slice. What separates this CPA from its Mid-City companions is measured on two specific instruments: its mean HCD opportunity score sits above District 9's own rather than below it, and one of its 4 tracts is Persistent RCAA, the only RCAA-concentrated tract in the four Mid-City communities, while a second is Diversifying Affluent, an affluent classification that is not RCAA. Alongside that, this CPA grew modestly while District 9 declined, and it sits at the low end of the three geographies on crowding, household size, and child share.

Key Findings

a) This CPA's population grew 2.9 percent since 2000 while District 9's population declined. Total population rose from 14,460 to 14,883, against District 9's fall from 156,904 to 154,217 (-1.7%) and citywide growth of 14.1 percent (Section 2). POC population grew 8.0 percent here, faster than District 9's near-flat -0.4 percent but well short of the city's 32.2 percent, while White NH population fell 1.8 percent, a milder decline than District 9's 5.0 percent.

b) Asian NH population fell 23.8 percent in this CPA while growing 46.9 percent citywide, the only race category here moving opposite the city's own direction for that category. Asian NH population declined from 1,578 to 1,203, a steeper fall than District 9's 5.7 percent decline over the same period, and the steepest race-category decline in this CPA (Section 3). Black NH population, by contrast, fell only 4.5 percent here, against District 9's 26.6 percent and the city's 22.4 percent.

c) This CPA is the least crowded of the three geographies at both endpoints, by a wide margin at the current one. Crowding fell from 11.7 percent to 2.3 percent here, against District 9's 26.9 percent to 10.0 percent and the city's 12.6 percent to 5.8 percent (Section 6). Severe crowding stands at 0.4 percent currently, against 4.2 percent district-wide and 2.4 percent citywide.

d) This CPA is the oldest of the three geographies at the current endpoint, having already carried the lowest child share in 2000. Its 65-plus share rose 4.1 percentage points, from 11.0 percent to 15.1 percent, ending above both District 9 (10.6 percent) and the city (14.9 percent), while District 9's own 65-plus rise over the same period was 3.4 points (Section 7). Its under-18 share fell from 20.2 percent to 15.3 percent, the lowest of the three geographies at both endpoints.

e) This CPA's mean HCD opportunity score (3) sits above District 9's own mean (2). Three of the CPA's 4 tracts are Moderate Resource and one remains Low Resource, with no tract in the High or Highest Resource tiers; the citywide mean is 5 (Section 9). The companion Mid-City:City Heights report runs the opposite relationship, with a CPA mean of 1 sitting below the same District 9 mean of 2.

f) This CPA holds District 9's entire RCAA-concentrated subtotal, 1 tract, while holding only 12.1 percent of the district's tracts (4 of 33). Tract 20.01 is classified Persistent RCAA (Section 9). The companion Mid-City:City Heights and Mid-City:Eastern Area reports carry zero RCAA-concentrated tracts, and Section 9 sets this CPA's concentration beside its comparatively higher opportunity tier.

g) This CPA's home value/income gap (+18.2 percentage points) sits closer to HCD's 25-point concern threshold than either benchmark, without crossing it. District 9's gap is +0.1pp and the city's is -4.2pp (Section 8b). The CPA crosses 2 of HCD's 3 rate-of-change thresholds, income change (165.2 percent) and rent change (65.2 percent), the same count as District 9 and the city.

h) A single tract, 23.01, carries all three HCD Neighborhood Change pathway designations simultaneously, plus spillover. It is the only tract in this CPA carrying any pathway flag, accounting for the CPA's entire Pathway 1A, Pathway 1B, and Pathway 2 count of one each (Section 9). The same tract shows the CPA's steepest under-18 decline, 12.0 percentage points, from 26.3 percent to 14.3 percent (Section 7).

Naturally occurring affordable housing. In 2000, 76.23 percent of this community's rentals paying cash rent rented within reach of a household at 60 percent of the county's median family income; in the current period 38.48 percent do, a change of -37.8 points and 1,138 fewer such rentals, against a citywide share that moved from 55.00 to 27.57 percent (-27.4 points). At 80 percent of median family income the share moved from 90.43 to 71.56 percent, -18.9 points and 316 fewer such rentals, against a citywide share that moved from 77.12 to 53.05 percent (-24.1 points). These are stock figures: they describe what the rental stock rents for in each period and say nothing about where any household went (Section 8c).

Neighborhood Change: Flagged Geography Contained to One Tract

One of this CPA's 4 tracts carries any HCD Neighborhood Change pathway designation, against 12 of 33 tracts district-wide and 44 of 311 citywide (Section 9). That single tract, 23.01, carries Pathway 1A, Pathway 1B, and Pathway 2 at the same time, plus a spillover designation. The CPA's only other flagged tract, 20.02, carries spillover alone with no pathway flag of its own, and the remaining two tracts carry neither. The flagged geography here is therefore contained to one tract rather than distributed across the CPA, and the intensity of the flagging is concentrated in that same tract rather than spread thinly across several: 23.01 also holds the CPA's steepest under-18 decline (-12.0pp, Section 7) and is its environmental-concentration top tract at a CalEnviroScreen 5.0 percentile of 43.6 with 21.8 percent of the CPA's population (Section 10). Why that one tract carries all three designations at once is not established by this data (Section 12).

Additional Context

Black (alone) households grew on both tenures in this CPA, owner-occupied from 44 to 90 (+104.5%) and renter-occupied from 540 to 667 (+23.5%), the opposite direction from the companion Mid-City:City Heights and Mid-City:Eastern Area reports, where Black households declined on both tenures (Section 5a). The owner-side counts involved are small in absolute terms. Overall, this CPA's owner-occupied households are essentially flat (+0.1%) while renter-occupied grew 12.9 percent, close to the reverse of District 9's own split (+13.6% owner, +1.3% renter).

Owner mobility has fallen further here than in either benchmark. The share of owner households that moved in the last 5 years fell from 39.0 percent to 11.3 percent, ending below both District 9 (15.1 percent) and the city (14.5 percent) after starting above both in 2000, and the 2-year owner-mover rate now stands at 0.9 percent against 1.7 percent district-wide and 1.8 percent citywide (Section 5b). Average household size is the smallest of the three geographies at both endpoints, 2.273 falling to 2.178, against District 9's 2.854 to 2.627 and the city's 2.619 to 2.521 (Section 4a). Total housing unit

growth of 11.3 percent outpaces District 9's 8.0 percent but trails the city's 21.7 percent, while this CPA's current population-weighted median home value ($1,125,844) sits more than $190,000 above the city's (Sections 4a and 8a). Environmental burden is comparatively low, with an overall CalEnviroScreen 5.0 percentile of 32.0 against District 9's 58.3 and the city's 37.1, with traffic percentile (67.6) the one sub-metric running above both benchmarks (Section 10). These figures draw on Census Bureau data cross-checked against HCD's independent methodologies; the data document patterns of change over time, but they do not on their own establish why an individual household moved into or out of a given tract.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

2. Population (2000 → Current)

	CPA 2000	CPA Current	Δ	District 9 2000	District 9 Current	Δ	City 2000	City Current	Δ
Total	14,460	14,883	+2.9%	156,904	154,217	-1.7%	1,184,838	1,351,501	+14.1%
White NH	7,460	7,325	-1.8%	44,644	42,407	-5.0%	578,087	549,251	-5.0%
POC	7,000	7,558	+8.0%	112,260	111,810	-0.4%	606,751	802,250	+32.2%

This CPA grew slightly (+2.9%) while District 9 declined (-1.7%) and the city grew far faster (+14.1%). White NH population here fell only 1.8 percent, a much milder decline than District 9's 5.0 percent, while POC population grew 8.0 percent, faster than District 9's near-flat -0.4 percent but far slower than the city's 32.2 percent.

3. Population by Race Breakdown

Category	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Asian NH	1,578	1,203	-23.8%	19,500	18,389	-5.7%	161,444	237,181	+46.9%
Black NH	1,409	1,346	-4.5%	18,759	13,776	-26.6%	88,855	68,939	-22.4%
Hispanic or Latino	3,301	4,107	+24.4%	66,595	71,247	+7.0%	304,758	404,143	+32.6%
Other/Two+ NH	712	902	+26.7%	7,405	8,398	+13.4%	51,695	91,987	+77.9%
White NH	7,460	7,325	-1.8%	44,644	42,407	-5.0%	578,087	549,251	-5.0%

Black NH population fell only 4.5 percent in this CPA, far milder than District 9's 26.6 percent decline and the city's 22.4 percent decline – this CPA's Black population is comparatively stable against both benchmarks. Asian NH population fell 23.8 percent here, the CPA's steepest race-category decline, against District 9's much milder 5.7 percent decline and citywide growth of 46.9 percent – the only race category in this CPA moving opposite the city's own direction for that category.

4a. Housing Units & Households (2000 → Current)

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Total units	6,544	7,285	+11.3%	56,526	61,050	+8.0%	460,671	560,804	+21.7%
Occupied units	6,305	6,809	+8.0%	54,426	57,924	+6.4%	442,094	523,840	+18.5%
Vacant/Unoccupied units	239	476	+99.2%	2,099	3,126	+48.9%	18,577	36,964	+99.0%
of which: Seasonal/Recreational/Occasional Use	26	75	+188.5%	256	453	+76.9%	5,785	9,999	+72.9%
Vacancy rate	3.7%	6.5%	+2.9pp	3.7%	5.1%	+1.4pp	4.0%	6.6%	+2.6pp
Avg household size	2.273	2.178	-4.2%	2.854	2.627	-8.0%	2.619	2.521	-3.8%

Change categories across this community's tracts, 2000 to current: 1 stable, 3 units grew – no tract in this CPA falls into the unit-loss category or the occupancy-pattern-change category. This CPA's total-unit growth (+11.3%) outpaces District 9's (+8.0%), and its vacancy rate rose the most in percentage-point terms of the three geographies (+2.9pp), ending above District 9's (6.5% vs. 5.1%) and just below the city's (6.6%) despite starting even with District 9's own rate. Seasonal vacant units nearly tripled here (+188.5%), the fastest growth of the three geographies, though the CPA's seasonal share of total vacant stock remains small in absolute terms (26 to 75 units). This CPA's average household size (2.273, falling to 2.178) is the smallest of the three geographies at both endpoints, well below District 9's (2.854 → 2.627) and the city's (2.619 → 2.521).

4b. Housing Production (6th RHNA Cycle)

The current RHNA cycle began in April 2021. This section reports housing units that reached the Permitted phase of HCD's Annual Progress Report (Table A2) framework from that date forward, the stage at which a project has cleared entitlement and received a building permit. Figures are drawn directly from HCD's own APR submissions, reconciled against the Lab's tract-level geography and opportunity classifications.

> Of the 2,331 below-moderate-income units permitted in High and Highest Resource tracts citywide during the current RHNA cycle, Mid-City:Kensington-Talmadge's own High and Highest Resource tracts accounted for 0, or 0.0%.

Units Permitted, 6th Cycle Summary (April 2021 to Present)

Metric	Mid-City:Kensington-Talmadge	D9	City of San Diego	Geography Share
Existing housing stock (all in-city tracts)	7,285	64,825	568,857	1.3%
Total units permitted	193	3,601	35,482	0.5%
Above Moderate income	157	2,713	28,771	0.5%
Below Moderate income (deed-restricted)	36	888	6,711	0.5%
Units permitted per 1,000 existing units	26.5	55.5	62.4	–
Below-moderate units permitted per 1,000 existing	4.9	13.7	11.8	–

Source: HCD Annual Progress Report Table A2, Permitted phase, reconciled to the Lab's tract geography. Below-moderate income includes Acutely Low, Extremely Low, Very Low, Low, and Moderate income tiers combined; in this dataset every below-moderate unit permitted is deed-restricted, so the two figures are not independent counts. Existing housing stock is counted over all in-city census tracts with no group-quarters exclusion, a slightly wider universe than the household and demographic figures in Section 4a and elsewhere, which exclude group-quarters-heavy tracts. Production is a count of construction rather than a household rate, so the group-quarters exclusion that protects household measures does not apply to it. 2025 figures are drawn from the most recent HCD APR submission on file and may not reflect a full calendar year of reporting. Unit-type categories in the table below are HCD's own Table A2 classifications and are not independently re-derived by the Lab.

Units Permitted by Year, Mid-City:Kensington-Talmadge

Year	Total Units Permitted	Below-Moderate Units
2018	11	0
2019	15	0
2020	210	0
2021	33	2
2022	25	0
2023	25	0
2024	68	27
2025	47	7

2018-2020 predate the current RHNA cycle and are shown for trend context only; the 6th-cycle production summary above uses only permits dated April 2021 forward.

Units Permitted by Type

Year	SFD	2 to 4	5+	ADU	Total
2018	0	0	0	11	11
2019	0	0	0	15	15
2020	0	2	195	13	210
2021	0	0	0	33	33
2022	0	0	6	19	25
2023	1	0	0	24	25
2024	0	0	25	43	68
2025	0	0	0	47	47

SFD: single-family detached. SFA: single-family attached. “2 to 4”: duplex through fourplex. “5+”: multifamily buildings of five units or more. ADU: accessory dwelling unit. MH: mobile home. Categories are HCD’s own Table A2 classifications and are not independently re-derived by the Lab. Row totals reconcile exactly to the year-by-year totals in the table above. 2025 figures may not reflect a full calendar year of reporting.

The City of San Diego’s 2025 Baker Settlement commits the City to include data demonstrating that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. The settlement counts projects; the figures here count units, so they are a companion measure and not the settlement’s own. Citywide, 51.6% of below-moderate units permitted during the current RHNA cycle have landed in those tiers. Mid-City:Kensington-Talmadge’s own below-moderate units permitted in Moderate, High, or Highest Resource tracts stand at 100.0%.

5a. Households by Race x Tenure (2000 → Current)

Mid-City:Kensington-Talmadge – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	82	138	+56	+68.3%
Black (alone)	44	90	+46	+104.5%
Hispanic or Latino	206	194	-12	-5.8%
White NH	2,368	2,280	-88	-3.7%
Four-race subtotal	**2,700**	**2,702**	**+2**	**+0.1%**
Not covered	38	110	–	–
Household total	**2,738**	**2,812**	**+74**	**+2.7%**

Mid-City:Kensington-Talmadge – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	449	447	-2	-0.4%
Black (alone)	540	667	+127	+23.5%
Hispanic or Latino	737	1,170	+433	+58.8%
White NH	1,588	1,456	-132	-8.3%
Four-race subtotal	**3,314**	**3,740**	**+426**	**+12.9%**
Not covered	253	257	–	–
Household total	**3,567**	**3,997**	**+430**	**+12.1%**

District 9 – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	1,083	2,232	+1,149	+106.1%
Black (alone)	1,010	1,082	+72	+7.1%
Hispanic or Latino	3,620	4,977	+1,357	+37.5%
White NH	10,813	10,476	-337	-3.1%
Four-race subtotal	**16,527**	**18,767**	**+2,240**	**+13.6%**
Not covered	335	860	–	–
Household total	**16,862**	**19,627**	**+2,765**	**+16.4%**

District 9 – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	4,492	4,004	-488	-10.9%
Black (alone)	6,459	4,886	-1,573	-24.4%
Hispanic or Latino	12,830	16,068	+3,238	+25.2%
White NH	11,986	11,274	-712	-5.9%
Four-race subtotal	**35,768**	**36,232**	**+464**	**+1.3%**
Not covered	1,796	2,065	–	–
Household total	**37,564**	**38,297**	**+733**	**+2.0%**

City of San Diego – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	24,172	48,159	+23,987	+99.2%
Black (alone)	11,124	7,948	-3,176	-28.6%
Hispanic or Latino	27,478	43,704	+16,226	+59.1%
White NH	152,986	139,318	-13,668	-8.9%
Four-race subtotal	**215,760**	**239,129**	**+23,369**	**+10.8%**
Not covered	4,827	10,722	–	–
Household total	**220,587**	**249,851**	**+29,264**	**+13.3%**

City of San Diego – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	22,271	36,133	+13,862	+62.2%
Black (alone)	21,734	20,730	-1,004	-4.6%
Hispanic or Latino	49,980	76,480	+26,500	+53.0%
White NH	119,064	123,964	+4,900	+4.1%
Four-race subtotal	**213,049**	**257,307**	**+44,258**	**+20.8%**
Not covered	8,459	16,682	–	–
Household total	**221,508**	**273,989**	**+52,481**	**+23.7%**

Black/Asian use the ACS "alone" definition here, not the NH-exclusive definition used in Section 3 – not directly comparable across the two sections. This CPA's owner-occupied count is essentially flat (+0.1%) while renter-occupied grew (+12.9%), against District 9's own shift of +13.6% owner and +1.3% renter – notably, this CPA's tenure growth runs in close to the opposite pattern from District 9's (District 9 grew mostly on the owner side, this CPA grew almost entirely on the renter side). Black (alone) households grew on both tenures here (owner +104.5%, renter +23.5%), the opposite direction from the companion Mid-City:City Heights and Mid-City:Eastern Area reports, where Black households declined on both tenures. These four race categories do not sum exactly to Section 4a's occupied-unit totals – the race-by-tenure source excludes Other/Two+ NH households.

"Not covered" is the household total less the four categories printed above it, as printed. The categories come from a different Census table than the total and the 2000 values are allocated onto current tract boundaries, so the difference can fall below zero; where it does the cell is not stated. The row is the net of households the four categories omit and households they count twice, not a category, and no rate of change is computed on it.

5b. Mobility

Mobility (% Moved in Last 5 Years)

Metric	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Owner	39.0%	11.3%	36.9%	15.1%	37.0%	14.5%
Renter	83.2%	35.9%	82.8%	35.3%	81.0%	45.0%

This CPA's current owner mobility (11.3%) sits below both District 9 (15.1%) and the city (14.5%).

Mobility (% Moved in Last 2 Years)

Metric	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Owner	12.7%	0.9%	12.3%	1.7%	12.0%	1.8%
Renter	44.3%	7.1%	40.9%	7.2%	41.4%	10.0%

Source: American Community Survey, year the householder moved into the unit. 2013 is omitted entirely, not shown as zero: no bracket finer than ~4 years exists in the ACS 2009-2013 5-year vintage, so both figures are empty for every tract in this CPA, District 9, and citywide in 2013. This CPA's current owner 2yr-mover rate (0.9%) sits below both District 9's (1.7%) and the city's (1.8%).

6. Crowding

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
% Crowded	11.7%	2.3%	-9.4pp	26.9%	10.0%	-16.9pp	12.6%	5.8%	-6.8pp
% Severely Crowded	6.4%	0.4%	-6.0pp	17.7%	4.2%	-13.5pp	7.2%	2.4%	-4.7pp

This CPA is the least crowded of the three geographies at both endpoints on both measures, ending at a fraction of District 9's current crowding rate (2.3% vs. 10.0%) and below the city's rate (5.8%) as well. Severe crowding has nearly disappeared here (0.4% currently), well below both benchmarks.

7. Age Composition (2000 → Current)

Bracket	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Under 18	20.2%	15.3%	30.0%	19.7%	24.4%	18.8%
18-34	30.0%	29.0%	33.2%	32.9%	29.0%	28.4%
35-64	38.9%	40.5%	29.6%	36.7%	36.0%	37.9%
65+	11.0%	15.1%	7.2%	10.6%	10.6%	14.9%

This CPA's under-18 share (20.2% in 2000) started well below District 9's (30.0%) and the city's (24.4%), and remains the lowest of the three at the current endpoint (15.3%). Its 65+ share rose 4.1 percentage points (11.0% → 15.1%), more than District 9's 3.4-point rise, ending above both District 9 (10.6%) and the city (14.9%) – this CPA is the oldest of the three geographies at the current endpoint, on top of already having the lowest child share.

Per-tract age-bracket swings (2000 → Current):

Tract	<18 share 2000 → Current	<18 Δ	65+ share 2000 → Current	65+ Δ	HCD Pathway	RCAA
23.01	26.3% → 14.3%	**-12.0pp**	6.6% → 14.0%	+7.5pp	1A, 1B, 2, Spillover	None
21	24.9% → 14.4%	-10.5pp	5.8% → 7.2%	+1.4pp	–	None
20.02	11.8% → 18.8%	**+7.0pp**	15.3% → 13.6%	-1.6pp	Spillover	Diversifying Affluent
20.01	13.3% → 14.9%	+1.6pp	20.6% → 29.1%	**+8.5pp**	–	Persistent RCAA

This CPA's 4 tracts split sharply: two show steep under-18 decline (23.01, 21) while one shows the CPA's only rising under-18 share (20.02, +7.0pp). 23.01 is the only tract in this CPA – and one of very few identified anywhere in the Lab's Mid-City set – carrying all three HCD pathway designations (1A, 1B, and 2) simultaneously alongside spillover (Section 9). 20.01 carries the CPA's largest 65+ rise (+8.5pp) and is classified Persistent RCAA (Section 12).

8a. Economic Trend (Population-Weighted Medians)

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Income	$46,937	$122,676	+161.4%	$29,820	$79,548	+166.8%	$50,274	$117,634	+134.0%
Home value	$241,358	$1,125,844	+366.5%	$141,984	$703,432	+395.4%	$226,860	$932,173	+310.9%
Monthly cost	$958	$2,221	+131.8%	$715	$1,987	+177.9%	$1,079	$2,499	+131.6%

This CPA's home value exceeds District 9's and the city's at both endpoints; its income exceeds both currently and sat below the city's in 2000 ($46,937 against $50,274). Its current home value ($1,125,844) is the highest figure of the three geographies by a wide margin – more than $190,000 above the city's current median. This CPA's income growth rate (+161.4%) sits between District 9's (+166.8%) and the city's (+134.0%). 2000 figures are nominal 1999 dollars, not inflation-adjusted – see the Sources and Methods section for the nominal-dollars caveat, which applies identically here.

8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change)

	Mid-City:Kensington-Talmadge	District 9	City of San Diego	Regional Threshold
Income change 2000-2023	165.2% (ABOVE)	144.5% (ABOVE)	126.1% (ABOVE)	50th pctile: 109.3%
Rent change 2013-2023	65.2% (ABOVE)	70.1% (ABOVE)	64.8% (ABOVE)	50th pctile: 64.5%
Home value/income gap	+18.2pp (below 25pp)	+0.1pp (below 25pp)	-4.2pp (below 25pp)	flat 25pp

This CPA crosses 2 of HCD's 3 rate-of-change thresholds (income and rent), the same count as District 9 and the city, though its home value/income gap (+18.2pp) is far closer to the 25-point concern threshold than either benchmark – this CPA does not cross that threshold, but sits closer to crossing it than District 9 (+0.1pp) or the city (-4.2pp). HCD's published rate-of-change values are converted from fractions to percentages here, as in every Lab report (Sources and Methods).

8c. Naturally Occurring Affordable Housing

A rental counts as affordable here when its gross rent is at or below 30 percent of a stated share of HUD's median family income for San Diego County, divided by twelve. At 60 percent of median family income the threshold was $805.50 a month in 2000 and is $1,792.50 in the current period; at 80 percent, $1,074.00 and $2,390.00. No subsidy status, building age or covenant enters the test: it is a rent test on the whole rental stock, which is what "naturally occurring" means. The denominator is renter-occupied homes paying cash rent. **Units, not households**: the Census reports what a home rents for, not who lives in it.

Rentals affordable at 60 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:Kensington-Talmadge	4	3,508	2,674	76.23%	3,992	1,536	38.48%	-37.8	-24.1	-1,138	-593
District 9	33	37,119	29,490	79.45%	37,765	16,657	44.11%	-35.3	-20.7	-12,833	-7,299
City of San Diego	311	212,529	116,897	55.00%	268,003	73,894	27.57%	-27.4	-18.2	-43,004	-18,621

Rentals affordable at 80 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:Kensington-Talmadge	4	3,508	3,172	90.43%	3,992	2,857	71.56%	-18.9	-11.5	-316	-31
District 9	33	37,119	34,262	92.30%	37,765	28,516	75.51%	-16.8	-10.4	-5,746	-3,325
City of San Diego	311	212,529	163,898	77.12%	268,003	142,181	53.05%	-24.1	-15.3	-21,717	-405

Census 2000 (SF3 table H062, harmonised to 2020 tract boundaries) against ACS 2020-2024 (table B25063). Where a threshold falls inside a published rent bracket, the units in that bracket are counted in proportion to where the threshold sits. **Change** is the current share minus the 2000 share as printed, in points; it recomputes from the two shares beside it on every row. **Floor** is the change in share when every unit in the boundary bracket is counted as affordable now and none of them in 2000, so it is the figure that survives an adversarial reading. **Change, worst case** applies the same treatment to the count. Figures sum units across member tracts and then divide; no figure is an average of tract shares. Every row is the 311-tract household universe described at the top of this report, so the community, district and city rows are comparable with each other. Every row holds its direction under either treatment of the boundary bracket.

Tract detail. A tract share is stated only where it survives three rules: at least 100 rentals paying cash rent in both years, a coefficient of variation (CV) at or under 30 percent on the rent bracket containing the threshold, and a low-to-high band no wider than 25 points. Where it does not, the count stands alone and the reason is given. The current-period rent brackets are $500 wide above $1,500 and both thresholds fall inside one, which is why most tract shares carry bands too wide to state; the community is the reportable unit. Do not restore a suppressed share from the counts.

Tract detail at 60 percent, 4 tracts, 0 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
20.01	30	43	not stated	CV 66
20.02	122	49	not stated	CV 68; 2000 reallocated from more than one source tract
21	1,584	855	not stated	band 41 pts
23.01	938	588	not stated	band 28 pts

Tract detail at 80 percent, 4 tracts, 1 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
20.01	80	86	not stated	CV 39
20.02	253	142	not stated	CV 64; band 30 pts; 2000 reallocated from more than one source tract
21	1,818	1,572	73%	
23.01	1,023	1,058	not stated	band 35 pts

These are stock figures. They say how much of the rental stock rents below a threshold; they do not say where anyone went or why, and setting them beside growth figures describes two things happening at once rather than one causing the other. Deed-restricted homes renting below the threshold are inside these counts, not subtracted from them. Where a 2000 count is marked as reallocated, that tract's 2000 figure is an estimate allocated from more than one 2000 census tract onto the current boundary. Reference incomes are HUD's median family income for San Diego County, $53,700 for fiscal year 2000 and $119,500 for fiscal year 2024; each threshold is 30 percent of the stated share of that income, divided by twelve.

9. Supplementary Context

HCD Opportunity Tier

Source: California HCD 2026 Opportunity Map. The opportunity score is a 0-9 ordinal tier (0-3 Low Resource, 4-5 Moderate, 6-7 High, 8-9 Highest), not a percentile.

Tier	Mid-City:Kensington-Talmadge	District 9	City of San Diego
Highest Resource	0	1	117
High Resource	0	1	53
Moderate Resource	3	7	45
Low Resource	1	24	95
Unclassified	0	0	1
Total tracts	**4**	**33**	**311**
Mean opportunity score (0-9, wtd)	3	2	5
Environmental burden flag (tract count)	0	0	23
High-poverty & segregation flag (tract count)	0	2	3

This CPA's mean opportunity score (3) exceeds District 9's own mean (2), the opposite relationship from the companion Mid-City:City Heights report, where the CPA's mean (1) sits below District 9's own mean (2). Three of this CPA's 4 tracts are Moderate Resource; only one remains Low Resource.

HCD Neighborhood Change Pathway Flags

Pathway	Mid-City:Kensington-Talmadge	District 9	City of San Diego
Pathway 1A	1	8	28
Pathway 1B	1	3	9
Pathway 2	1	11	35
Any Pathway	1	12	44
Spillover	2	15	53
Total tracts	**4**	**33**	**311**

A single tract, 23.01, accounts for this CPA's entire Pathway 1A, 1B, and Pathway 2 count – it is the only tract in this CPA carrying any HCD designation and carries all three pathway flags simultaneously plus spillover, an unusually concentrated pattern (Section 7). The CPA's second flagged tract, 20.02, carries spillover only, with no pathway flag of its own.

Racial Concentration of Affluence (RCAA)

Reported per the Lab's two-subtotal convention: RCAA-concentrated (Persistent + Reinforcing/Intensifying + Newly RCAA) and diversifying/opening (Converging High-Opportunity + Diversifying Affluent) are reported as separate subtotals, never combined.

	Mid-City:Kensington-Talmadge	District 9	City of San Diego
RCAA-concentrated subtotal	1	1	26
Diversifying/opening subtotal	1	1	28
None	2	31	257
Total tracts	**4**	**33**	**311**

This CPA carries a Persistent RCAA tract (20.01) – District 9's entire RCAA-concentrated subtotal, 1 of 1, sits in this single 4-tract CPA, even though this CPA holds only 12.1% of District 9's tracts (4 of 33). This is a real concentration, and it sits alongside this CPA's comparatively higher opportunity tier (this section, above); the data do not establish either as the cause of the other. The companion Mid-City:City Heights and Mid-City:Eastern Area reports carry zero RCAA-concentrated tracts.

Cross-Cluster Context: El Cajon Blvd Corridor

All 4 of this CPA's tracts sit inside the Lab's El Cajon Boulevard corridor cluster (34 tracts across seven community planning areas), making this CPA part of what that cluster report frames as the corridor's western/residential catchment rather than its commercial spine. The cluster report is a city-only comparison (District 3 holds a majority with a real District 9 minority), a different structure from this CPA-tier report's District 9 + city columns, since this CPA alone, unlike the cluster as a whole, sits entirely within a single district. Readers should treat the two reports as complementary, not interchangeable: the cluster report captures corridor-wide commercial-spine dynamics that this CPA-level report, focused on a purely residential 4-tract footprint, does not address.

Community Plan Update Context

These findings are produced in the context of the City of San Diego's ongoing Mid-City Communities Community Plan Update. The patterns most directly relevant to this CPA are supply constraint and affordability: this CPA's total housing unit growth (+11.3%) trails the city's (+21.7%) even as its home values (+366.5%) and rents (crossing HCD's rent-growth threshold at 65.2%, Section 8b) grew faster than the city on some measures, and its home value/income gap (+18.2pp) sits closer to HCD's 25-point concern threshold than either District 9 or the city (Section 8b). This CPA also carries District 9's only RCAA-concentrated tract (Section 9), unlike the companion Mid-City:City Heights and Mid-City:Eastern Area reports, where no tract carries any RCAA classification – a pattern directly relevant to fair housing analysis of opportunity access. Without making a causal claim the data cannot support, the plan update is a concrete opportunity under AB 686 and the City's AFFH obligations to affirmatively address the fair housing patterns documented in this report – the data documents the condition; the plan update is the policy moment.

10. Climate Equity

Source: CalEnviroScreen 5.0. Percentiles are on a 0-100 scale; higher means greater burden/vulnerability.

Metric	Mid-City:Kensington-Talmadge (wtd)	District 9 (wtd)	City of San Diego (wtd)
CES 5.0 overall percentile	32.0	58.3	37.1
Pollution burden percentile	47.6	52.6	43.6
Population characteristics percentile	27.1	60.5	35.7
Traffic percentile	67.6	63.7	57.7
Drinking water percentile	18.9	18.8	20.3

This CPA's overall CES percentile (32.0) is well below both District 9 (58.3) and the city (37.1) – well below the companion Mid-City:City Heights (74.0) and Mid-City:Eastern Area (62.8) reports' figures as well. Its traffic percentile (67.6) is the one sub-metric where this CPA runs above both benchmarks. **Concentration check:** the top tract, 23.01, carries a CES percentile of 43.6 and holds 21.8% of the CPA's population – excluding it shifts the population-weighted average by 3.2 points (32.0 → 28.8), a real but modest effect; this CPA's low environmental burden remains broad-based rather than resting on one or two tracts. Drinking water percentile carries the standing drinking-water caution described in the Sources and Methods section.

11. Sources and Methods

Data sources. U.S. Census Bureau: the 2000 Decennial Census (Summary File 3) and the American Community Survey five-year estimates for 2020-2024, with the 2009-2013 estimates shown as a middle point where a 2013 column appears. California HCD's 2026 Opportunity Map and Neighborhood Change methodology. HCD Annual Progress Report Table A2 for housing production. CalEnviroScreen 5.0. HUD median family income for San Diego County, fiscal years 2000 and 2024, for Section 8c.

Geography and the citywide basis. Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced. Census tracts are on 2020 boundaries; 2000 figures are allocated onto them through the Census Bureau's tract relationship files, and where a current tract draws on more than one 2000 tract its 2000 figure is an estimate. Section 4b's production figures are the one exception to the 311-tract basis: production is a count of construction rather than a household rate, so its existing-stock denominator uses all in-city tracts with no group-quarters exclusion.

Comparison columns. All 4 of this community's census tracts sit in Council District 9, so the report compares the community with District 9 and with the city. The District 9 column is the whole district, not only this community's part of it.

How figures are aggregated. Rates sum numerators and denominators across tracts before dividing. Medians (income, home value, monthly housing cost) are population-weighted averages of tract medians. Section 8c sums rental units across tracts and then divides. No figure in this report is an average of tract shares.

Dollars. 2000 dollar figures are nominal 1999 dollars, not inflation-adjusted. The 2000 median monthly housing cost carries a reliability caution and should be read as indicative.

Race categories. Sections 2 and 3 use non-Hispanic-exclusive categories: White NH, Black NH, Asian NH and Other/Two+ NH are non-Hispanic, and Hispanic or Latino is any race. Section 5a's Black and Asian householders use the Census "alone" definition, which is not restricted to non-Hispanic, so Section 5a is not drawn from the same universe as Sections 2 and 3 and the two cannot be differenced against each other.

Income change measured two ways. Section 8a reports the change in the population-weighted median household income from 2000 to the current period. Section 8b reports HCD's own rate-of-change measure over HCD's periods (2000-2023 for income, 2013-2023 for rent) against HCD's regional thresholds. The two use different series and periods and are not expected to agree. HCD publishes its rate-of-change values as fractions; they are multiplied by 100 to read as percentages, confirmed against HCD's own methodology, and the same conversion is applied in every Lab report.

Racially concentrated areas of affluence. A tract meets the RCAA screen when it sits in the top 20 percent of San Diego County tracts on a composite of median income, median home value and median monthly housing cost, and in the bottom 20 percent on the share of residents who are people of color,

each ranked within its own period. Tracts meeting the screen are Persistent, Newly or Reinforcing/Intensifying RCAA by how they moved between periods; Converging High-Opportunity (High or Highest Resource tracts becoming more representative) and Diversifying Affluent (affluent tracts no longer meeting the screen) are not RCAA. RCAA figures follow a two-subtotal convention: the concentrated subtotal (Persistent, Reinforcing/Intensifying and Newly RCAA) is reported separately from the diversifying subtotal (Converging High-Opportunity and Diversifying Affluent), and the two are never summed into one total, because they point in opposite directions.

Drinking water percentile. CalEnviroScreen's drinking water indicator carries a standing caution in the Lab's data-quality log: it reads as a near-constant value across most of the city, so differences on that one measure should not be read as confirmed.

Tract highlights. Section 12's tract list comes from a scan of every tract in the community for four signals: the largest age-bracket percentage-point swings from 2000 to the current period, any HCD Neighborhood Change pathway flag, any RCAA classification, and any earlier tract-level analysis by the Lab. For this community the scan surfaced age-bracket swings across all 4 tracts, 2 HCD-flagged tracts, one Persistent RCAA tract and one Diversifying Affluent tract, which is not RCAA (Sections 7 and 9).

Documents cited in this report. This report is Appendix 3 to the Mid-City Communities Fair Housing Review (San Diego Fair Housing Lab, 2026), which reads the four community reports together against the draft Mid-City Communities Plan. Its companions are the City Heights, Eastern Area and Normal Heights community reports. The Lab working documents behind this report are not published; the methods they carry are restated above.

12. Tract-Level Detail

The tracts below are the ones the highlight scan (Section 11) surfaced. None has yet been the subject of a tract-level report, and the notes record what the scan found so that a future one starts from them.

Notable tracts

- **23.01** – the CPA's steepest under-18 decline (-12.0pp) and the only tract in this CPA carrying an HCD pathway designation of any kind, and unusually, all three (1A, 1B, and 2) simultaneously, plus spillover. Also this CPA's environmental-concentration top tract (CES 43.6 percentile, 21.8% of the CPA's population). No RCAA classification.
- **20.01** – the CPA's largest 65+ rise (+8.5pp) and its Persistent RCAA tract. No HCD pathway flag.
- **20.02** – the only tract in this CPA with a rising under-18 share (+7.0pp), running against the CPA's own aggregate direction. Carries spillover (no pathway flag) and is classified Diversifying Affluent, an affluent classification that is not RCAA.
- **21** – the CPA's second-steepest under-18 decline (-10.5pp). No HCD pathway flag, no RCAA classification.

These four tracts have not been checked against permit or development records or any other independent source, and they are named here as candidates for a future tract-level report rather than built out in this one.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

Terms used in this document

Census tract
A small statistical area the Census Bureau uses to report data, usually holding between 1,200 and 8,000 people. San Diego's city limits contain 311 of them in this analysis, 30 of which sit inside the Mid-City plan boundary. It is the smallest geography at which the figures in this review can be reported.

Community planning area (CPA)
The City of San Diego's own neighborhood planning boundaries. City Heights, Eastern Area, Kensington-Talmadge and Normal Heights are each one, and together they make up the Mid-City Communities Plan boundary. Every figure here that names a neighborhood uses these official boundaries.

Opportunity tier
A four-level ranking published by California's housing department and tax credit committee, placing every census tract in the state in Low, Moderate, High or Highest Resource based on measures of education, economic conditions and environment. It is the State's classification, not this organization's.

Low Resource
The lowest of the State's four opportunity tiers. Twenty-three of the thirty tracts in the Mid-City plan boundary sit here, against 95 of 311 citywide.

Moderate Resource
The second of the State's four opportunity tiers. Six Mid-City tracts sit here.

High Resource
The third of the State's four opportunity tiers. One Mid-City tract sits here, in Normal Heights.

Highest Resource
The top of the State's four opportunity tiers. No tract inside the Mid-City plan boundary sits here; 117 tracts citywide do.

Neighborhood change area
A tract carrying one of the State's Neighborhood Change pathway designations, its marker for a historically lower-income community of color that has since seen substantial racial and economic change. Nine of the thirty Mid-City tracts carry one, against 44 of 311 citywide.

Neighborhood Change pathway
The State's method for identifying neighborhood change, published in 2026. A tract can qualify under Pathway 1A, 1B or 2, each testing a different combination of historical condition, demographic change and housing-cost pressure. This review refers to a tract carrying any of them as a neighborhood change area.

Rate-of-change threshold
Part of the State's neighborhood change method. A tract is tested against regional benchmarks for how fast its income, its racial composition and its rents have moved. The rent benchmark for the San Diego region is 64.5 percent growth since 2013.

Racially Concentrated Area of Affluence (RCAA)
A neighborhood where high-income, predominantly non-Hispanic White households are concentrated well above the regional norm. State law now requires every California jurisdiction's housing element to analyse these areas specifically. One tract inside the Mid-City plan boundary carries this classification.

Persistent RCAA
A tract classified as a Racially Concentrated Area of Affluence at every point measured, rather than one that has recently become or ceased to be one. Tract 20.01 in Kensington-Talmadge is District 9's only one.

RECAP
A Racially and Ethnically Concentrated Area of Poverty, the counterpart to an RCAA. The City's own Housing Element Fair Housing Appendix places two City Heights tracts inside its RECAP cluster.

Affirmatively furthering fair housing (AFFH)
The legal duty, under California Government Code section 8899.50 and AB 686, to take meaningful actions that overcome patterns of segregation and foster inclusive communities, rather than simply avoiding discrimination. It applies to a community plan update as it does to a housing element.

AB 686
A 2018 California law, effective 2019, requiring every housing element to include a data-driven, geographically specific analysis of segregation patterns, disparities in access to opportunity and concentrated poverty, and to set goals and actions addressing what that analysis finds.

AB 1304
A 2021 California law, in effect from 2022, that sharpened AB 686 by requiring every housing element's fair housing analysis to identify racially or ethnically concentrated areas of affluence as well as of poverty, and to show how the sites the jurisdiction plans for housing affirmatively further fair housing. It applies statewide.

Baker Settlement
A binding commitment the City of San Diego entered in March 2025, agreeing to show that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. It is a reporting duty rather than a requirement to build, and it counts projects rather than homes.

CalEnviroScreen
California's tool for scoring cumulative pollution burden and community vulnerability, reported as a statewide percentile from 0 to 100. A higher number means greater burden. City Heights sits at 74.0 against a citywide 37.1.

RHNA
The Regional Housing Needs Allocation, the State's assignment to each jurisdiction of how many homes it must plan for, by income level, over an eight-year cycle.

Capacity
What a plan's land use map would allow to be built, if every site that could redevelop did. It is not a forecast of what will be built, and this review does not treat it as one. The draft does not publish capacity by community planning area.

Permitted
A home the City has authorised. It is not yet a home that exists. This review reports production as permitted or as completed and never computes a rate between the two.

Completed
A home that has been built and finished, as distinct from one that has been permitted.

Below-moderate housing
Homes permitted at any affordability level other than above-moderate: the moderate tier and every tier below it. In practice these are deed-restricted affordable units. This review reports it as units permitted per 1,000

existing homes so communities of different sizes can be compared.

Deed-restricted
A home carrying a legal restriction that keeps it affordable to households at a stated income level for a set period, rather than one that happens to be inexpensive at the moment.

Accessory dwelling unit (ADU)
A small secondary home on a lot that already has a house, sometimes called a granny flat or backyard unit. About seven in ten housing permits in Mid-City are for these, against about two in ten citywide.

Suitable sites inventory
The list of parcels a jurisdiction identifies as able to accommodate its assigned housing need. The City's own inventory places 36.3 percent of its suitable sites inside areas it identifies as carrying displacement risk.

Crowding
A household living at more than one person per room. City Heights' rate is 15.7 percent against a citywide 5.8 percent.

Growth gap
The difference between a community's housing unit growth and its population growth, in percentage points. A positive gap means units were added faster than people arrived. Two of the four Mid-City communities added housing while losing population, and three of the four added housing faster than people arrived.

Displacement risk area
A geography the City's own Housing Element Fair Housing Appendix identifies as carrying elevated risk that lower-income residents will be pushed out. All four Mid-City communities appear in the City's lists.

Margin of error
The range within which a survey estimate is likely to fall. American Community Survey figures for small areas carry wide margins, which is why this review reports some measures at community level rather than tract level.

Normal Heights Community Fair Housing Report

Appendix 4 to the Mid-City Communities Fair Housing Review

Prepared by San Diego Fair Housing Lab
Date September 2026
Mid-City Communities Plan Update, September 2026

Contents

About this report 3
1. Narrative 4
2. Population (2000 → Current) 7
3. Population by Race Breakdown 8
4a. Housing Units & Households (2000 → Current) 9
4b. Housing Production (6th RHNA Cycle) 10
5a. Households by Race x Tenure (2000 → Current) 12
5b. Mobility 14
6. Crowding 15
7. Age Composition (2000 → Current) 16
8a. Economic Trend (Population-Weighted Medians) 17
8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change) 18
8c. Naturally Occurring Affordable Housing 19
9. Supplementary Context 21
10. Climate Equity 24
11. Sources and Methods 25
12. Tract-Level Detail 27
Terms used in this document 28

About this report

Mid-City Communities Plan Update. Community planning area: Mid-City:Normal Heights. Appendix 4 to the Mid-City Communities Fair Housing Review. San Diego Fair Housing Lab, 2026.

> **How to read the City of San Diego columns.** Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced.
>
> **How to read the comparison columns.** All 4 of this community's census tracts sit in Council District 9, so the report compares the community with District 9 and with the city. The District 9 column is the whole district, not only this community's part of it.

This report covers demographic, housing and economic change from 2000 to the current period (American Community Survey 2020-2024) for one of the four communities in the Mid-City Communities Plan Update, with companion reports for City Heights, Eastern Area and Kensington-Talmadge. Sources and methods are set out in Section 11.

1. Narrative

This report examines demographic, housing, and economic change in the Mid-City:Normal Heights community planning area from 2000 to the current period, comparing the CPA against both District 9 and the citywide baseline, drawing on U.S. Census Bureau data (2000 Decennial Census and American Community Survey) and California HCD's Neighborhood Change and Opportunity Map methodologies. The CPA's most distinctive finding is a compositional one: its Black NH population fell 76.6 percent since 2000, from 1,827 to 427, the steepest race-category change of any figure in this report's tables and far steeper than District 9's own 26.6 percent decline or the city's 22.4 percent (Section 3). That change occurred in the only one of the Lab's four current Mid-City community planning areas where every tract carries an HCD Neighborhood Change pathway flag: all 4 of this CPA's tracts show Pathway 2, and 2 of the 4 carry all three pathway designations simultaneously (Section 9). Alongside those two findings, this CPA reports the fastest income growth of the three geographies compared here, an opportunity-tier profile matching the citywide average, and an overall environmental burden well below both benchmarks.

Key Findings

a) Black NH population in Mid-City:Normal Heights fell 76.6 percent since 2000, from 1,827 to 427. That decline runs far ahead of District 9's own 26.6 percent decline and the city's 22.4 percent over the same period, and it is the steepest race-category change of any figure in this report's tables (Section 3). The 2000 base of 1,827 is large enough that the figure is not a small-sample artifact. Every other race category in this CPA moved in the opposite direction or fell only mildly: Hispanic or Latino population grew 13.9 percent, Other/Two+ NH grew 57.5 percent, Asian NH grew 3.4 percent, and White NH fell 2.4 percent (Section 3).

b) This CPA's total population declined 4.4 percent while District 9 held nearly flat and the city grew. Total population fell from 14,126 to 13,510, against District 9's 1.7 percent decline and the city's 14.1 percent growth (Section 2). POC population fell 6.1 percent here against District 9's near-flat -0.4 percent, while White NH population fell more mildly (-2.4%) than District 9's own 5.0 percent decline. Housing units grew 7.0 percent over the same period, trailing both District 9 (+8.0%) and the city (+21.7%), and average household size fell 11.0 percent, from 2.165 to 1.928 (Section 4a).

c) All 4 of this CPA's tracts carry an HCD Neighborhood Change pathway flag and a spillover designation. All 4 carry Pathway 2, and two tracts, 17 and 18.02, carry Pathway 1A, 1B, and Pathway 2 simultaneously (Sections 7, 9). This CPA alone accounts for 4 of District 9's 12 flagged tracts (33.3%) while holding 12.1 percent of the district's tracts (4 of 33), a markedly more concentrated flagging pattern than the companion Mid-City:Kensington-Talmadge report, where only 1 of 4 tracts carried any designation (Section 9).

d) This CPA's mean opportunity score matches the citywide average exactly and sits well above District 9's, yet no tract here carries a Racial Concentration of Affluence (RCAA) classification. Its mean opportunity score is 5, the same as the citywide mean and well above District 9's 2, and no tract in this CPA falls in the Low Resource tier, against District 9's 24 (Section 9). The RCAA screen is regional affluence and racial composition, the top 20 percent of county tracts on affluence together

with the bottom 20 percent on people-of-color share, and this CPA's High Resource tract sits at the 69th percentile on affluence and the 23rd on people-of-color share, so it misses the screen on both counts and both subtotals stand at zero (Section 9).

e) Income in this CPA grew 198.6 percent since 2000, the fastest rate of the three geographies compared here, and its margin above HCD's regional thresholds is the widest of the three on both measures it crosses. Population-weighted median income rose from $32,945 to $98,358, against District 9's +166.8 percent and the city's +134.0 percent (Section 8a). On HCD's rate-of-change measures this CPA crosses 2 of 3 thresholds, the same count as District 9 and the city, but by the widest margin of the three on both it crosses: income change of 186.5 percent sits 77.2 percentage points above the 50th-percentile regional threshold, and rent change of 83.1 percent sits 18.6 points above it (Section 8b). The 2000 figures are nominal 1999 dollars, not inflation-adjusted (Section 8a).

f) This CPA's under-18 share fell 11.8 percentage points to 10.4 percent, the lowest child share of the three geographies at the current endpoint, while its 35-64 share is the highest of the three. Under-18 share fell from 22.2 percent to 10.4 percent, against 19.7 percent district-wide and 18.8 percent citywide currently, and every one of this CPA's four tracts shows a declining under-18 share, ranging from -3.8pp in 19 to -18.0pp in 18.02 (Section 7). The 35-64 share rose to 42.0 percent, above District 9's 36.7 percent and the city's 37.9 percent, and the 18-34 share rose 3.2 points, the only one of the three geographies where that bracket grew rather than held flat or declined (Section 7).

g) This CPA's traffic percentile runs sharply above both benchmarks even though its overall environmental burden runs well below them. Its CalEnviroScreen 5.0 overall percentile is 18.1, against District 9's 58.3 and the city's 37.1, driven especially by a low population characteristics percentile of 11.7 (Section 10). Its traffic percentile of 87.4 runs the other way, above District 9's 63.7 and the city's 57.7, and is the one sub-metric where this CPA registers high burden (Section 10).

Naturally occurring affordable housing. In 2000, 85.24 percent of this community's rentals paying cash rent rented within reach of a household at 60 percent of the county's median family income; in the current period 43.58 percent do, a change of -41.7 points and 2,054 fewer such rentals, against a citywide share that moved from 55.00 to 27.57 percent (-27.4 points). That 60 percent change is the steepest of the four Mid-City communities. At 80 percent of median family income the share moved from 96.11 to 78.90 percent, -17.2 points and 920 fewer such rentals, against a citywide share that moved from 77.12 to 53.05 percent (-24.1 points). These are stock figures: they describe what the rental stock rents for in each period and say nothing about where any household went (Section 8c).

Neighborhood Change: A Sharp Compositional Shift in Intensely Flagged Geography

All 4 of Mid-City:Normal Heights' tracts carry an HCD Neighborhood Change pathway flag and a spillover designation, every single tract rather than a subset. All 4 carry Pathway 2, and 2 of the 4, 17 and 18.02, carry Pathway 1A, 1B, and Pathway 2 simultaneously, with this CPA's entire Pathway 1A and 1B count coming from those two tracts (Sections 7, 9). That flagging pattern co-occurs with this CPA's 76.6 percent decline in Black NH population since 2000, from 1,827 to 427 (Section 3), and with Black (alone) household declines on both tenures over the same period (owner -86.2%, renter -70.4%, Section 5a). The pairing runs opposite to the pattern in the companion Mid-City:Eastern Area report,

where a comparably sharp compositional shift carries zero HCD pathway signal; here the compositional shift co-occurs with HCD's own methodology registering the geography as intensely flagged.

Whether HCD's pathway flags here are responding specifically to the Black population decline, to this CPA's broader income and rent trends (Section 8b), or to some combination is not established by this data and is not claimed here. The two facts are recorded together because they describe the same geography in the same period, not because a causal link between them has been tested.

Additional Context

Black (alone) households in this CPA fell on both tenures between 2000 and the current period: owner-occupied from 51 to 7 (-86.2 percent, a small absolute base) and renter-occupied from 813 to 241 (-70.4 percent, a substantial absolute base), both steeper than District 9's own Black household changes (owner +7.1%, renter -24.4%) and the city's (owner -28.6%, renter -4.6%) (Section 5a). Most other race categories in this CPA grew on both tenures over the same period, with Asian (alone) owner households up 133.4 percent and Hispanic or Latino owner households up 92.5 percent; Section 5a uses the ACS "alone" definition rather than the NH-exclusive definition used in Section 3, so the two are not directly comparable. Owner mobility swung sharply: the share of owner households that had moved within the prior five years fell from 44.8 percent in 2000 to 20.5 percent currently, remaining above both benchmarks (15.1 percent district-wide, 14.5 percent citywide), while the 2-year owner-mover rate fell from 16.8 percent, the highest of the three geographies in 2000, to 1.2 percent, the lowest of the three currently (Section 5b). This CPA's environmental profile is concentrated rather than even: its top tract, 17, carries a CES percentile of 25.9 and holds 36.0 percent of the CPA's population, and excluding it shifts the population-weighted average 4.4 points, from 18.1 to 13.6, a real but directionally consistent effect, since the low overall burden holds with or without that tract (Section 10). This CPA's vacancy rate is the only one of the three geographies to fall rather than rise (3.7 percent to 3.6 percent), ending below both District 9 (5.1 percent) and the city (6.6 percent) (Section 4). These patterns draw on verified Census Bureau data cross-checked against HCD's independent methodologies. The data document patterns of change over time; they do not, on their own, establish why an individual household left a given tract.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

2. Population (2000 → Current)

	CPA 2000	CPA Current	Δ	District 9 2000	District 9 Current	Δ	City 2000	City Current	Δ
Total	14,126	13,510	-4.4%	156,904	154,217	-1.7%	1,184,838	1,351,501	+14.1%
White NH	6,649	6,486	-2.4%	44,644	42,407	-5.0%	578,087	549,251	-5.0%
POC	7,478	7,024	-6.1%	112,260	111,810	-0.4%	606,751	802,250	+32.2%

This CPA's population declined 4.4 percent, a steeper decline than District 9's 1.7 percent, while the city grew 14.1 percent. POC population fell 6.1 percent here, against District 9's near-flat -0.4 percent, while White NH population fell more mildly (-2.4%) than District 9's own 5.0 percent decline – see Section 3 for the race-category breakdown behind this POC figure.

3. Population by Race Breakdown

Category	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Asian NH	710	734	+3.4%	19,500	18,389	-5.7%	161,444	237,181	+46.9%
Black NH	1,827	427	**-76.6%**	18,759	13,776	-26.6%	88,855	68,939	-22.4%
Hispanic or Latino	4,395	5,004	+13.9%	66,595	71,247	+7.0%	304,758	404,143	+32.6%
Other/Two+ NH	545	859	+57.5%	7,405	8,398	+13.4%	51,695	91,987	+77.9%
White NH	6,649	6,486	-2.4%	44,644	42,407	-5.0%	578,087	549,251	-5.0%

Black NH population in this CPA fell 76.6 percent, from 1,827 to 427 – a decline far steeper than District 9's own 26.6 percent and the city's 22.4 percent, and the steepest race-category change of any figure in this report's tables. This is a real, verified figure from a starting base large enough not to be a small-sample artifact (1,827 in 2000); see Section 5a for the household-level tenure breakdown behind this population-level change, and Section 9 for how this squares against HCD's own Neighborhood Change detection.

4a. Housing Units & Households (2000 → Current)

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Total units	6,762	7,232	+7.0%	56,526	61,050	+8.0%	460,671	560,804	+21.7%
Occupied units	6,508	6,973	+7.1%	54,426	57,924	+6.4%	442,094	523,840	+18.5%
Vacant/Unoccupied units	253	259	+2.2%	2,099	3,126	+48.9%	18,577	36,964	+99.0%
of which: Seasonal/Recreational/Occasional Use	28	48	+70.8%	256	453	+76.9%	5,785	9,999	+72.9%
Vacancy rate	3.7%	3.6%	-0.2pp	3.7%	5.1%	+1.4pp	4.0%	6.6%	+2.6pp
Avg household size	2.165	1.928	-11.0%	2.854	2.627	-8.0%	2.619	2.521	-3.8%

Change categories across this community's tracts, 2000 to current: 3 units grew, 1 lost units. This CPA's vacancy rate is the only one of the three geographies to fall rather than rise (-0.2pp), ending well below both District 9 (5.1%) and the city (6.6%). Its average household size (2.165, falling to 1.928) is the smallest of the three geographies at the current endpoint and fell the furthest in percentage terms (-11.0%, against District 9's -8.0% and the city's -3.8%) – consistent with the population decline in Section 2 occurring alongside modest housing unit growth (+7.0%).

4b. Housing Production (6th RHNA Cycle)

The current RHNA cycle began in April 2021. This section reports housing units that reached the Permitted phase of HCD's Annual Progress Report (Table A2) framework from that date forward, the stage at which a project has cleared entitlement and received a building permit. Figures are drawn directly from HCD's own APR submissions, reconciled against the Lab's tract-level geography and opportunity classifications.

> Of the 2,331 below-moderate-income units permitted in High and Highest Resource tracts citywide during the current RHNA cycle, Mid-City:Normal Heights' own High and Highest Resource tracts accounted for 3, or 0.1%.

Units Permitted, 6th Cycle Summary (April 2021 to Present)

Metric	Mid-City:Normal Heights	D9	City of San Diego	Geography Share
Existing housing stock (all in-city tracts)	7,232	64,825	568,857	1.3%
Total units permitted	197	3,601	35,482	0.6%
Above Moderate income	178	2,713	28,771	0.6%
Below Moderate income (deed-restricted)	19	888	6,711	0.3%
Units permitted per 1,000 existing units	27.2	55.5	62.4	–
Below-moderate units permitted per 1,000 existing	2.6	13.7	11.8	–

Source: HCD Annual Progress Report Table A2, Permitted phase, reconciled to the Lab's tract geography. Below-moderate income includes Acutely Low, Extremely Low, Very Low, Low, and Moderate income tiers combined; in this dataset every below-moderate unit permitted is deed-restricted, so the two figures are not independent counts. Existing housing stock is counted over all in-city census tracts with no group-quarters exclusion, a slightly wider universe than the household and demographic figures in Section 4a and elsewhere, which exclude group-quarters-heavy tracts. Production is a count of construction rather than a household rate, so the group-quarters exclusion that protects household measures does not apply to it. 2025 figures are drawn from the most recent HCD APR submission on file and may not reflect a full calendar year of reporting. Unit-type categories in the table below are HCD's own Table A2 classifications and are not independently re-derived by the Lab.

Units Permitted by Year, Mid-City:Normal Heights

Year	Total Units Permitted	Below-Moderate Units
2018	13	0
2019	39	1
2020	20	0
2021	30	1
2022	23	0
2023	25	1
2024	38	2
2025	84	15

2018-2020 predate the current RHNA cycle and are shown for trend context only; the 6th-cycle production summary above uses only permits dated April 2021 forward.

Units Permitted by Type

Year	SFD	SFA	2 to 4	5+	ADU	MH	Total
2018	2	0	0	0	11	0	13
2019	1	0	2	14	22	0	39
2020	0	0	0	0	20	0	20
2021	0	0	0	0	30	0	30
2022	1	1	0	0	21	0	23
2023	1	0	0	0	23	1	25
2024	2	0	0	0	36	0	38
2025	3	0	0	27	54	0	84

SFD: single-family detached. SFA: single-family attached. "2 to 4": duplex through fourplex. "5+": multifamily buildings of five units or more. ADU: accessory dwelling unit. MH: mobile home. Categories are HCD's own Table A2 classifications and are not independently re-derived by the Lab. Row totals reconcile exactly to the year-by-year totals in the table above. 2025 figures may not reflect a full calendar year of reporting.

The City of San Diego's 2025 Baker Settlement commits the City to include data demonstrating that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. The settlement counts projects; the figures here count units, so they are a companion measure and not the settlement's own. Citywide, 51.6% of below-moderate units permitted during the current RHNA cycle have landed in those tiers. Mid-City:Normal Heights' own below-moderate units permitted in Moderate, High, or Highest Resource tracts stand at 100.0%.

5a. Households by Race x Tenure (2000 → Current)

Mid-City:Normal Heights – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	80	187	+107	+133.4%
Black (alone)	51	7	-44	**-86.2%**
Hispanic or Latino	183	352	+169	+92.5%
White NH	1,332	1,575	+243	+18.2%
Four-race subtotal	**1,646**	**2,121**	**+475**	**+28.8%**
Not covered	–	154	–	–
Household total	**1,644**	**2,275**	**+631**	**+38.4%**

Mid-City:Normal Heights – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	211	192	-19	-9.2%
Black (alone)	813	241	-572	**-70.4%**
Hispanic or Latino	1,145	1,488	+343	+29.9%
White NH	2,492	2,422	-70	-2.8%
Four-race subtotal	**4,662**	**4,343**	**-319**	**-6.8%**
Not covered	203	355	–	–
Household total	**4,865**	**4,698**	**-167**	**-3.4%**

District 9 – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	1,083	2,232	+1,149	+106.1%
Black (alone)	1,010	1,082	+72	+7.1%
Hispanic or Latino	3,620	4,977	+1,357	+37.5%
White NH	10,813	10,476	-337	-3.1%
Four-race subtotal	**16,527**	**18,767**	**+2,240**	**+13.6%**
Not covered	335	860	–	–
Household total	**16,862**	**19,627**	**+2,765**	**+16.4%**

District 9 – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	4,492	4,004	-488	-10.9%
Black (alone)	6,459	4,886	-1,573	-24.4%
Hispanic or Latino	12,830	16,068	+3,238	+25.2%
White NH	11,986	11,274	-712	-5.9%
Four-race subtotal	**35,768**	**36,232**	**+464**	**+1.3%**
Not covered	1,796	2,065	–	–
Household total	**37,564**	**38,297**	**+733**	**+2.0%**

City of San Diego – Owner-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	24,172	48,159	+23,987	+99.2%
Black (alone)	11,124	7,948	-3,176	-28.6%
Hispanic or Latino	27,478	43,704	+16,226	+59.1%
White NH	152,986	139,318	-13,668	-8.9%
Four-race subtotal	**215,760**	**239,129**	**+23,369**	**+10.8%**
Not covered	4,827	10,722	–	–
Household total	**220,587**	**249,851**	**+29,264**	**+13.3%**

City of San Diego – Renter-Occupied

Race Category	2000	Current	Δ	Δ%
Asian (alone)	22,271	36,133	+13,862	+62.2%
Black (alone)	21,734	20,730	-1,004	-4.6%
Hispanic or Latino	49,980	76,480	+26,500	+53.0%
White NH	119,064	123,964	+4,900	+4.1%
Four-race subtotal	**213,049**	**257,307**	**+44,258**	**+20.8%**
Not covered	8,459	16,682	–	–
Household total	**221,508**	**273,989**	**+52,481**	**+23.7%**

Black/Asian use the ACS "alone" definition here, not the NH-exclusive definition used in Section 3 – not directly comparable across the two sections. Black (alone) households collapsed on both tenures in this CPA: owner-occupied fell 86.2 percent (51 to 7, a small absolute base) and renter-occupied fell 70.4 percent (813 to 241, a substantial absolute base), both far steeper than District 9's own Black household declines (owner +7.1%, renter -24.4%) or the city's (owner -28.6%, renter -4.6%). Unlike the population-level pattern in Section 3, where Black decline outpaces every other race category by a wide margin, this CPA's other race categories mostly grew on both tenures: Asian (alone) owner households grew 133.4 percent and Hispanic or Latino owner households grew 92.5 percent. These four race categories do not sum exactly to Section 4a's occupied-unit totals – the race-by-tenure source excludes Other/Two+ NH households.

"Not covered" is the household total less the four categories printed above it, as printed. The categories come from a different Census table than the total and the 2000 values are allocated onto current tract boundaries, so the difference can fall below zero; where it does the cell is not stated. The row is the net of households the four categories omit and households they count twice, not a category, and no rate of change is computed on it.

5b. Mobility

Mobility (% Moved in Last 5 Years)

Metric	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Owner	44.8%	20.5%	36.9%	15.1%	37.0%	14.5%
Renter	80.7%	43.9%	82.8%	35.3%	81.0%	45.0%

This CPA's current owner mobility (20.5%) sits above both benchmarks (15.1% district-wide, 14.5% citywide) – unlike the companion Mid-City:Kensington-Talmadge report, where current owner mobility sits below both benchmarks.

Mobility (% Moved in Last 2 Years)

Metric	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Owner	16.8%	1.2%	12.3%	1.7%	12.0%	1.8%
Renter	37.6%	7.0%	40.9%	7.2%	41.4%	10.0%

Source: American Community Survey, year the householder moved into the unit. 2013 is omitted entirely, not shown as zero: no bracket finer than ~4 years exists in the ACS 2009-2013 5-year vintage, so both figures are empty for every tract in this CPA, District 9, and citywide in 2013. This CPA's current owner 2yr-mover rate (1.2%) is the lowest of the three geographies (vs. 1.7% district-wide and 1.8% citywide).

6. Crowding

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
% Crowded	13.0%	2.8%	-10.2pp	26.9%	10.0%	-16.9pp	12.6%	5.8%	-6.8pp
% Severely Crowded	5.9%	0.8%	-5.1pp	17.7%	4.2%	-13.5pp	7.2%	2.4%	-4.7pp

This CPA is far less crowded than District 9 at both endpoints and ends below the city as well (2.8% vs. 5.8% currently), a similar profile to the companion Mid-City:Kensington-Talmadge report.

7. Age Composition (2000 → Current)

Bracket	CPA 2000	CPA Current	D9 2000	D9 Current	City 2000	City Current
Under 18	22.2%	10.4%	30.0%	19.7%	24.4%	18.8%
18-34	34.2%	37.4%	33.2%	32.9%	29.0%	28.4%
35-64	36.7%	42.0%	29.6%	36.7%	36.0%	37.9%
65+	6.9%	10.2%	7.2%	10.6%	10.6%	14.9%

This CPA's under-18 share fell 11.8 percentage points, from 22.2 percent to 10.4 percent – the lowest child share of the three geographies at the current endpoint by a wide margin (against 19.7% district-wide and 18.8% citywide). Its 18-34 share rose 3.2 points, the only geography of the three where that bracket grew rather than held flat or declined, and its 35-64 share (42.0% currently) is the highest of the three geographies.

Per-tract age-bracket swings (2000 → Current):

Tract	<18 share 2000 → Current	<18 Δ	65+ share 2000 → Current	65+ Δ	HCD Pathway
18.02	24.8% → 6.8%	**-18.0pp**	4.7% → 5.3%	+0.6pp	1A, 1B, 2, Spillover
17	23.5% → 10.7%	-12.8pp	6.4% → 4.7%	-1.6pp	1A, 1B, 2, Spillover
18.01	24.8% → 15.4%	-9.4pp	4.7% → 15.7%	**+11.0pp**	2, Spillover
19	14.5% → 10.8%	-3.8pp	12.5% → 20.5%	+8.0pp	2, Spillover

Every tract in this CPA shows a declining under-18 share; the range runs from -3.8pp to -18.0pp. 18.02 and 17 both carry all three HCD pathway designations simultaneously plus spillover – two of the CPA's four tracts, not one, an unusually concentrated pattern shared with neither of the Lab's other two D9-unanimous Mid-City CPAs (Section 9; Section 12).

8a. Economic Trend (Population-Weighted Medians)

Metric	CPA 2000	CPA Current	CPA Δ	D9 2000	D9 Current	D9 Δ	City 2000	City Current	City Δ
Income	$32,945	$98,358	+198.6%	$29,820	$79,548	+166.8%	$50,274	$117,634	+134.0%
Home value	$148,319	$697,428	+370.2%	$141,984	$703,432	+395.4%	$226,860	$932,173	+310.9%
Monthly cost	$707	$1,967	+178.3%	$715	$1,987	+177.9%	$1,079	$2,499	+131.6%

This CPA's income growth rate (+198.6%) is the fastest of the three geographies by a wide margin, against District 9's +166.8% and the city's +134.0%. Its home value ($697,428 currently) and monthly cost ($1,967) both sit close to District 9's own figures ($703,432 and $1,987 respectively) at the current endpoint, despite this CPA's income growing faster. 2000 figures are nominal 1999 dollars, not inflation-adjusted – see the Sources and Methods section for the nominal-dollars caveat, which applies identically here.

8b. Rate-of-Change vs. Regional Benchmark (HCD Neighborhood Change)

	Mid-City:Normal Heights	District 9	City of San Diego	Regional Threshold
Income change 2000-2023	186.5% (ABOVE)	144.5% (ABOVE)	126.1% (ABOVE)	50th pctile: 109.3%
Rent change 2013-2023	83.1% (ABOVE)	70.1% (ABOVE)	64.8% (ABOVE)	50th pctile: 64.5%
Home value/income gap	-14.2pp (below 25pp)	+0.1pp (below 25pp)	-4.2pp (below 25pp)	flat 25pp

This CPA crosses 2 of HCD's 3 rate-of-change thresholds (income and rent), the same count as District 9 and the city, with the widest margin above threshold of the three geographies on both measures it crosses (income +77.2pp above threshold, rent +18.6pp above threshold). HCD's published rate-of-change values are converted from fractions to percentages here, as in every Lab report (Sources and Methods).

8c. Naturally Occurring Affordable Housing

A rental counts as affordable here when its gross rent is at or below 30 percent of a stated share of HUD's median family income for San Diego County, divided by twelve. At 60 percent of median family income the threshold was $805.50 a month in 2000 and is $1,792.50 in the current period; at 80 percent, $1,074.00 and $2,390.00. No subsidy status, building age or covenant enters the test: it is a rent test on the whole rental stock, which is what "naturally occurring" means. The denominator is renter-occupied homes paying cash rent. **Units, not households**: the Census reports what a home rents for, not who lives in it.

Rentals affordable at 60 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:Normal Heights	4	4,807	4,098	85.24%	4,689	2,043	43.58%	-41.7	-21.1	-2,054	-1,089
District 9	33	37,119	29,490	79.45%	37,765	16,657	44.11%	-35.3	-20.7	-12,833	-7,299
City of San Diego	311	212,529	116,897	55.00%	268,003	73,894	27.57%	-27.4	-18.2	-43,004	-18,621

Rentals affordable at 80 percent of median family income

	Tracts	2000 rentals paying cash rent	2000 affordable	2000 share	Current rentals paying cash rent	Current affordable	Current share	Change (points)	Floor (points)	Affordable rentals, change	Change, worst case
Mid-City:Normal Heights	4	4,807	4,620	96.11%	4,689	3,700	78.90%	-17.2	-12.0	-920	-675
District 9	33	37,119	34,262	92.30%	37,765	28,516	75.51%	-16.8	-10.4	-5,746	-3,325
City of San Diego	311	212,529	163,898	77.12%	268,003	142,181	53.05%	-24.1	-15.3	-21,717	-405

Census 2000 (SF3 table H062, harmonised to 2020 tract boundaries) against ACS 2020-2024 (table B25063). Where a threshold falls inside a published rent bracket, the units in that bracket are counted in proportion to where the threshold sits. **Change** is the current share minus the 2000 share as printed, in points; it recomputes from the two shares beside it on every row. **Floor** is the change in share when every unit in the boundary bracket is counted as affordable now and none of them in 2000, so it is the figure that survives an adversarial reading. **Change, worst case** applies the same treatment to the count. Figures sum units across member tracts and then divide; no figure is an average of tract shares. Every row is the 311-tract household universe described at the top of this report, so the community, district and city rows are comparable with each other. Every row holds its direction under either treatment of the boundary bracket.

Tract detail. A tract share is stated only where it survives three rules: at least 100 rentals paying cash rent in both years, a coefficient of variation (CV) at or under 30 percent on the rent bracket containing the threshold, and a low-to-high band no wider than 25 points. Where it does not, the count stands alone and the reason is given. The current-period rent brackets are $500 wide above $1,500 and both thresholds fall inside one, which is why most tract shares carry bands too wide to state; the community is the reportable unit. Do not restore a suppressed share from the counts.

Tract detail at 60 percent, 4 tracts, 1 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
17	1,597	890	not stated	band 58 pts
18.01	853	346	not stated	band 56 pts
18.02	1,223	663	not stated	band 44 pts
19	425	144	24%	2000 reallocated from more than one source tract

Tract detail at 80 percent, 4 tracts, 1 with a reportable current share

Census tract	2000 affordable	Current affordable	Current share	Note
17	1,742	1,467	83%	
18.01	962	571	not stated	CV 39
18.02	1,379	1,309	not stated	band 27 pts
19	538	353	not stated	CV 34; band 32 pts; 2000 reallocated from more than one source tract

These are stock figures. They say how much of the rental stock rents below a threshold; they do not say where anyone went or why, and setting them beside growth figures describes two things happening at once rather than one causing the other. Deed-restricted homes renting below the threshold are inside these counts, not subtracted from them. Where a 2000 count is marked as reallocated, that tract's 2000 figure is an estimate allocated from more than one 2000 census tract onto the current boundary. Reference incomes are HUD's median family income for San Diego County, $53,700 for fiscal year 2000 and $119,500 for fiscal year 2024; each threshold is 30 percent of the stated share of that income, divided by twelve.

9. Supplementary Context

HCD Opportunity Tier

Source: California HCD 2026 Opportunity Map. The opportunity score is a 0-9 ordinal tier (0-3 Low Resource, 4-5 Moderate, 6-7 High, 8-9 Highest), not a percentile.

Tier	Mid-City:Normal Heights	District 9	City of San Diego
Highest Resource	0	1	117
High Resource	1	1	53
Moderate Resource	3	7	45
Low Resource	0	24	95
Unclassified	0	0	1
Total tracts	**4**	**33**	**311**
Mean opportunity score (0-9, wtd)	5	2	5
Environmental burden flag (tract count)	0	0	23
High-poverty & segregation flag (tract count)	0	2	3

This CPA's mean opportunity score (5) matches the citywide mean exactly and sits well above District 9's own mean (2) – no tract in this CPA is Low Resource. This is a more pronounced version of the pattern already documented in the companion Mid-City:Kensington-Talmadge report (CPA mean 3, also above District 9's mean of 2).

HCD Neighborhood Change Pathway Flags

Pathway	Mid-City:Normal Heights	District 9	City of San Diego
Pathway 1A	2	8	28
Pathway 1B	2	3	9
Pathway 2	4	11	35
Any Pathway	4	12	44
Spillover	4	15	53
Total tracts	**4**	**33**	**311**

All 4 of this CPA's tracts carry an HCD pathway flag and a spillover designation – every single tract, not a subset. This CPA alone accounts for 4 of District 9's 12 flagged tracts (33.3%) despite holding only 12.1 percent of the district's tracts (4 of 33), and all 4 of its tracts carry Pathway 2. Two tracts (17 and 18.02) carry Pathway 1A, 1B, and Pathway 2 simultaneously – the CPA's entire Pathway 1A and 1B count comes from just these two tracts (Section 7). This is a markedly more concentrated flagging pattern than the companion Mid-City:Kensington-Talmadge report, where only 1 of 4 tracts carried any designation.

Racial Concentration of Affluence (RCAA)

Reported per the Lab's two-subtotal convention: RCAA-concentrated (Persistent + Reinforcing/Intensifying + Newly RCAA) and diversifying/opening (Converging High-Opportunity + Diversifying Affluent) are reported as separate subtotals, never combined.

	Mid-City:Normal Heights	District 9	City of San Diego
RCAA-concentrated subtotal	0	1	26
Diversifying/opening subtotal	0	1	28
None	4	31	257
Total tracts	**4**	**33**	**311**

This CPA carries zero tracts in either subtotal despite having a High Resource tract and a mean opportunity score matching the citywide average. The RCAA screen is the top 20 percent of county tracts on a composite of income, home value and housing cost together with the bottom 20 percent on people-of-color share; this CPA's High Resource tract sits at the 69th percentile on affluence and the 23rd on people-of-color share, so it misses the screen on both counts. District 9's one RCAA-concentrated tract and its one Diversifying Affluent tract both sit in the companion Mid-City:Kensington-Talmadge report, not here (see that report's Section 9).

A Sharp Racial Compositional Shift Alongside the District's Most Intensely Flagged Geography

This CPA presents an unusual pairing worth stating plainly. Its Black NH population fell 76.6 percent since 2000 (1,827 to 427, Section 3), the steepest race-category decline documented anywhere in this report and a far steeper decline than either District 9 (-26.6%) or the city (-22.4%). Black (alone) households collapsed on both tenures at the household level too (owner -86.2%, renter -70.4%, Section 5a). At the same time, this is the only one of the Lab's four current Mid-City CPAs where every tract carries an HCD Neighborhood Change pathway flag: all 4 tracts show Pathway 2, and 2 of the 4 carry all three pathway designations simultaneously (this section, above). Unlike the Mid-City:Eastern Area report, where a comparably sharp compositional shift carries zero HCD pathway signal, this CPA's compositional shift co-occurs with HCD's own methodology registering the geography as intensely flagged. Whether HCD's pathway flags here are responding specifically to the Black population decline, to the CPA's broader economic and rent trends (Section 8b), or to some combination is not established by this data and is not claimed here – the two facts are recorded together because they describe the same geography in the same period, not because a causal link between them has been tested.

Cross-Cluster Context: El Cajon Blvd Corridor

All 4 of this CPA's tracts sit inside the Lab's El Cajon Boulevard corridor cluster (34 tracts across seven community planning areas), the same cluster membership as the companion Mid-City:Kensington-Talmadge report – both CPAs sit inside what that cluster report frames as the corridor's western/residential catchment rather than its commercial spine. The cluster report is a city-only comparison (District 3 holds a 67.6% majority against a real 32.4% District 9 minority), a different structure from this CPA-tier report's District 9 + city columns, since this CPA alone, unlike the cluster as a whole, sits entirely within a single district.

Community Plan Update Context

These findings are produced in the context of the City of San Diego's ongoing Mid-City Communities Community Plan Update. The patterns most directly relevant to this CPA span both framings the plan update should consider: supply constraint and affordability, and displacement pressure. On supply and affordability, this CPA's income growth (+198.6%) is the fastest of the three geographies examined in this report, its rent growth crosses HCD's threshold by the widest margin of the three (Section 8b), and

its housing unit growth (+7.0%) trails both District 9 (+8.0%) and the city (+21.7%) even as population fell (Section 2, 4). On displacement pressure, this CPA's Black NH population fell 76.6 percent since 2000, the steepest decline of any race category documented in this report, occurring in the same geography where every tract carries an HCD Neighborhood Change pathway flag (Section 9, above). Without making a causal claim the data cannot support, the plan update is a concrete opportunity under AB 686 and the City's AFFH obligations to affirmatively address the fair housing patterns documented in this report – the data documents the condition; the plan update is the policy moment.

10. Climate Equity

Source: CalEnviroScreen 5.0. Percentiles are on a 0-100 scale; higher means greater burden/vulnerability.

Metric	Mid-City:Normal Heights (wtd)	District 9 (wtd)	City of San Diego (wtd)
CES 5.0 overall percentile	18.1	58.3	37.1
Pollution burden percentile	42.8	52.6	43.6
Population characteristics percentile	11.7	60.5	35.7
Traffic percentile	87.4	63.7	57.7
Drinking water percentile	18.9	18.8	20.3

This CPA's overall CES percentile (18.1) is well below both District 9 (58.3) and the city (37.1), driven especially by a low population characteristics percentile (11.7). Its traffic percentile (87.4) runs sharply the other way, well above both benchmarks and the CPA's own otherwise low-burden profile – traffic is the one sub-metric where this CPA registers high burden. **Concentration check:** the top tract, 17, carries a CES percentile of 25.9 and holds 36.0% of the CPA's population, a larger population share than the top tract in either companion D9-unanimous Mid-City report; excluding it shifts the population-weighted average by 4.4 points (18.1 → 13.6), a real but directionally consistent effect – the CPA's low environmental burden holds with or without that tract. Drinking water percentile carries the standing drinking-water caution described in the Sources and Methods section.

11. Sources and Methods

Data sources. U.S. Census Bureau: the 2000 Decennial Census (Summary File 3) and the American Community Survey five-year estimates for 2020-2024, with the 2009-2013 estimates shown as a middle point where a 2013 column appears. California HCD's 2026 Opportunity Map and Neighborhood Change methodology. HCD Annual Progress Report Table A2 for housing production. CalEnviroScreen 5.0. HUD median family income for San Diego County, fiscal years 2000 and 2024, for Section 8c.

Geography and the citywide basis. Every City of San Diego figure in this report is computed over the same 311 census tracts: the 323 tracts inside the city limits, less 11 tracts whose residents live mainly in group quarters (dormitories, barracks and institutions) and one tract that is entirely water. The 11 are set aside so that household rates are not distorted by populations that do not live in households; they hold 2.7 percent of the city's residents (1,388,930 people in all 323 in-city tracts against 1,351,501 in these 311). The same basis is used in every Lab report, so figures are comparable across them. They are not the City's own published totals, and the two should not be differenced. Census tracts are on 2020 boundaries; 2000 figures are allocated onto them through the Census Bureau's tract relationship files, and where a current tract draws on more than one 2000 tract its 2000 figure is an estimate. Section 4b's production figures are the one exception to the 311-tract basis: production is a count of construction rather than a household rate, so its existing-stock denominator uses all in-city tracts with no group-quarters exclusion.

Comparison columns. All 4 of this community's census tracts sit in Council District 9, so the report compares the community with District 9 and with the city. The District 9 column is the whole district, not only this community's part of it.

How figures are aggregated. Rates sum numerators and denominators across tracts before dividing. Medians (income, home value, monthly housing cost) are population-weighted averages of tract medians. Section 8c sums rental units across tracts and then divides. No figure in this report is an average of tract shares.

Dollars. 2000 dollar figures are nominal 1999 dollars, not inflation-adjusted. The 2000 median monthly housing cost carries a reliability caution and should be read as indicative.

Race categories. Sections 2 and 3 use non-Hispanic-exclusive categories: White NH, Black NH, Asian NH and Other/Two+ NH are non-Hispanic, and Hispanic or Latino is any race. Section 5a's Black and Asian householders use the Census "alone" definition, which is not restricted to non-Hispanic, so Section 5a is not drawn from the same universe as Sections 2 and 3 and the two cannot be differenced against each other.

Income change measured two ways. Section 8a reports the change in the population-weighted median household income from 2000 to the current period. Section 8b reports HCD's own rate-of-change measure over HCD's periods (2000-2023 for income, 2013-2023 for rent) against HCD's regional thresholds. The two use different series and periods and are not expected to agree. HCD publishes its rate-of-change values as fractions; they are multiplied by 100 to read as percentages, confirmed against HCD's own methodology, and the same conversion is applied in every Lab report.

Racially concentrated areas of affluence. A tract meets the RCAA screen when it sits in the top 20 percent of San Diego County tracts on a composite of median income, median home value and median monthly housing cost, and in the bottom 20 percent on the share of residents who are people of color,

each ranked within its own period. Tracts meeting the screen are Persistent, Newly or Reinforcing/Intensifying RCAA by how they moved between periods; Converging High-Opportunity (High or Highest Resource tracts becoming more representative) and Diversifying Affluent (affluent tracts no longer meeting the screen) are not RCAA. RCAA figures follow a two-subtotal convention: the concentrated subtotal (Persistent, Reinforcing/Intensifying and Newly RCAA) is reported separately from the diversifying subtotal (Converging High-Opportunity and Diversifying Affluent), and the two are never summed into one total, because they point in opposite directions.

Drinking water percentile. CalEnviroScreen's drinking water indicator carries a standing caution in the Lab's data-quality log: it reads as a near-constant value across most of the city, so differences on that one measure should not be read as confirmed.

Tract highlights. Section 12's tract list comes from a scan of every tract in the community for four signals: the largest age-bracket percentage-point swings from 2000 to the current period, any HCD Neighborhood Change pathway flag, any RCAA classification, and any earlier tract-level analysis by the Lab. For this community the scan surfaced age-bracket swings across all 4 tracts and HCD-flagged tracts across all 4 (Sections 7 and 9), and zero RCAA-concentrated tracts.

Documents cited in this report. This report is Appendix 4 to the Mid-City Communities Fair Housing Review (San Diego Fair Housing Lab, 2026), which reads the four community reports together against the draft Mid-City Communities Plan. Its companions are the City Heights, Eastern Area and Kensington-Talmadge community reports. The Lab working documents behind this report are not published; the methods they carry are restated above.

12. Tract-Level Detail

The tracts below are the ones the highlight scan (Section 11) surfaced. None has yet been the subject of a tract-level report, and the notes record what the scan found so that a future one starts from them.

Notable tracts

- **18.02** – the CPA's steepest under-18 decline (-18.0pp) and one of two tracts carrying all three HCD pathway designations (1A, 1B, 2) simultaneously, plus spillover. No RCAA classification.
- **17** – the CPA's other triple-pathway tract (1A, 1B, 2, plus spillover), and its environmental-concentration top tract (CES 25.9 percentile, 36.0% of the CPA's population). No RCAA classification.
- **18.01** – the CPA's largest 65+ rise (+11.0pp). Carries Pathway 2 and spillover, but not Pathway 1A or 1B. No RCAA classification.
- **19** – the CPA's second-largest 65+ rise (+8.0pp) and smallest under-18 decline (-3.8pp). Carries Pathway 2 and spillover only. No RCAA classification.

These four tracts have not been checked against permit or development records or any other independent source, and they are named here as candidates for a future tract-level report rather than built out in this one. Given the magnitude of this CPA's Black population decline (Section 3, Section 9), a race/tenure decomposition at the individual-tract level, following the pattern the Lab applied to Mid-City:Eastern Area's tracts, is a natural next step, not yet performed here.

Sources: U.S. Census Bureau (2000 Decennial Census, American Community Survey); California HCD Neighborhood Change Mapping Tool and Opportunity Map (2026); CalEnviroScreen 5.0 (2026).

Terms used in this document

Census tract
A small statistical area the Census Bureau uses to report data, usually holding between 1,200 and 8,000 people. San Diego's city limits contain 311 of them in this analysis, 30 of which sit inside the Mid-City plan boundary. It is the smallest geography at which the figures in this review can be reported.

Community planning area (CPA)
The City of San Diego's own neighborhood planning boundaries. City Heights, Eastern Area, Kensington-Talmadge and Normal Heights are each one, and together they make up the Mid-City Communities Plan boundary. Every figure here that names a neighborhood uses these official boundaries.

Opportunity tier
A four-level ranking published by California's housing department and tax credit committee, placing every census tract in the state in Low, Moderate, High or Highest Resource based on measures of education, economic conditions and environment. It is the State's classification, not this organization's.

Low Resource
The lowest of the State's four opportunity tiers. Twenty-three of the thirty tracts in the Mid-City plan boundary sit here, against 95 of 311 citywide.

Moderate Resource
The second of the State's four opportunity tiers. Six Mid-City tracts sit here.

High Resource
The third of the State's four opportunity tiers. One Mid-City tract sits here, in Normal Heights.

Highest Resource
The top of the State's four opportunity tiers. No tract inside the Mid-City plan boundary sits here; 117 tracts citywide do.

Neighborhood change area
A tract carrying one of the State's Neighborhood Change pathway designations, its marker for a historically lower-income community of color that has since seen substantial racial and economic change. Nine of the thirty Mid-City tracts carry one, against 44 of 311 citywide.

Neighborhood Change pathway
The State's method for identifying neighborhood change, published in 2026. A tract can qualify under Pathway 1A, 1B or 2, each testing a different combination of historical condition, demographic change and housing-cost pressure. This review refers to a tract carrying any of them as a neighborhood change area.

Rate-of-change threshold
Part of the State's neighborhood change method. A tract is tested against regional benchmarks for how fast its income, its racial composition and its rents have moved. The rent benchmark for the San Diego region is 64.5 percent growth since 2013.

Racially Concentrated Area of Affluence (RCAA)
A neighborhood where high-income, predominantly non-Hispanic White households are concentrated well above the regional norm. State law now requires every California jurisdiction's housing element to analyse these areas specifically. One tract inside the Mid-City plan boundary carries this classification.

Persistent RCAA
A tract classified as a Racially Concentrated Area of Affluence at every point measured, rather than one that has recently become or ceased to be one. Tract 20.01 in Kensington-Talmadge is District 9's only one.

RECAP
A Racially and Ethnically Concentrated Area of Poverty, the counterpart to an RCAA. The City's own Housing Element Fair Housing Appendix places two City Heights tracts inside its RECAP cluster.

Affirmatively furthering fair housing (AFFH)
The legal duty, under California Government Code section 8899.50 and AB 686, to take meaningful actions that overcome patterns of segregation and foster inclusive communities, rather than simply avoiding discrimination. It applies to a community plan update as it does to a housing element.

AB 686
A 2018 California law, effective 2019, requiring every housing element to include a data-driven, geographically specific analysis of segregation patterns, disparities in access to opportunity and concentrated poverty, and to set goals and actions addressing what that analysis finds.

AB 1304
A 2021 California law, in effect from 2022, that sharpened AB 686 by requiring every housing element's fair housing analysis to identify racially or ethnically concentrated areas of affluence as well as of poverty, and to show how the sites the jurisdiction plans for housing affirmatively further fair housing. It applies statewide.

Baker Settlement
A binding commitment the City of San Diego entered in March 2025, agreeing to show that by at least 2028, at least 70 percent of the affordable housing projects in the City are permitted in moderate, high or highest resource areas. It is a reporting duty rather than a requirement to build, and it counts projects rather than homes.

CalEnviroScreen
California's tool for scoring cumulative pollution burden and community vulnerability, reported as a statewide percentile from 0 to 100. A higher number means greater burden. City Heights sits at 74.0 against a citywide 37.1.

RHNA
The Regional Housing Needs Allocation, the State's assignment to each jurisdiction of how many homes it must plan for, by income level, over an eight-year cycle.

Capacity
What a plan's land use map would allow to be built, if every site that could redevelop did. It is not a forecast of what will be built, and this review does not treat it as one. The draft does not publish capacity by community planning area.

Permitted
A home the City has authorised. It is not yet a home that exists. This review reports production as permitted or as completed and never computes a rate between the two.

Completed
A home that has been built and finished, as distinct from one that has been permitted.

Below-moderate housing
Homes permitted at any affordability level other than above-moderate: the moderate tier and every tier below it. In practice these are deed-restricted affordable units. This review reports it as units permitted per 1,000

existing homes so communities of different sizes can be compared.

Deed-restricted
A home carrying a legal restriction that keeps it affordable to households at a stated income level for a set period, rather than one that happens to be inexpensive at the moment.

Accessory dwelling unit (ADU)
A small secondary home on a lot that already has a house, sometimes called a granny flat or backyard unit. About seven in ten housing permits in Mid-City are for these, against about two in ten citywide.

Suitable sites inventory
The list of parcels a jurisdiction identifies as able to accommodate its assigned housing need. The City's own inventory places 36.3 percent of its suitable sites inside areas it identifies as carrying displacement risk.

Crowding
A household living at more than one person per room. City Heights' rate is 15.7 percent against a citywide 5.8 percent.

Growth gap
The difference between a community's housing unit growth and its population growth, in percentage points. A positive gap means units were added faster than people arrived. Two of the four Mid-City communities added housing while losing population, and three of the four added housing faster than people arrived.

Displacement risk area
A geography the City's own Housing Element Fair Housing Appendix identifies as carrying elevated risk that lower-income residents will be pushed out. All four Mid-City communities appear in the City's lists.

Margin of error
The range within which a survey estimate is likely to fall. American Community Survey figures for small areas carry wide margins, which is why this review reports some measures at community level rather than tract level.

SAN DIEGO
MOBILITY BOARD

August 19, 2026

City Planning Department
202 C Street
San Diego, CA 92101

Subject: Draft Mid-City Communities Plan

Dear Planning Department Staff,

The City of San Diego Mobility Board appreciates the work that has gone into the Draft Mid-City Communities Plan and supports its overall direction toward a safer, more walkable, bikeable, and transit-oriented Mid-City.

The draft plans for substantial growth over the next 30 years, including capacity for approximately 42,000 additional homes and 89,000 additional residents. That growth creates an opportunity to improve access to housing, jobs, schools, parks, and transit. As Mid-City grows, it is especially important that the transportation network and other public infrastructure keep pace.

The City's adopted Mobility Master Plan provides an important implementation framework for this work. It is intended to connect community planning, project prioritization, funding, implementation, and performance monitoring into a coordinated citywide mobility program. The Mid-City Communities Plan should build directly on that framework by ensuring that the mobility projects needed to support substantial new housing growth are clearly identified, prioritized, funded, and incorporated into future Mobility Master Plan updates. The Mobility Master Plan itself describes community plans as a key source for the projects that will shape the future mobility network.

The Mobility Board recommends strengthening the final plan in the following areas:

1. Establish an all-ages-and-abilities standard for the bicycle network

The draft correctly identifies that bicycle demand is highest along El Cajon Boulevard, University Avenue, Euclid Avenue, and portions of Adams Avenue, while many of these same corridors experience high levels of traffic stress.

However, the plan's more specific urban design recommendations explicitly call for increased bicycle safety along El Cajon Boulevard without providing the same level of direction for University Avenue, Euclid Avenue, and Adams Avenue. If these corridors are recognized as places with both high bicycle demand and high traffic stress, the final plan should provide a consistent safety standard across the network.

The final plan should establish an all-ages-and-abilities, low-stress standard for the planned bicycle network and implement the City's existing "Class IV First" policy. The Mobility Master Plan specifically calls for implementation of community plan bicycle networks using a Class IV First approach. On high-volume and high-speed corridors, Class IV or equivalent physical protection should be the default, with lower-class facilities used only where traffic conditions can provide an all-ages-and-abilities environment.

This standard should also consider whether the network actually connects people to the places they need to go. Bike facilities should provide safe, continuous access to schools, jobs, commercial districts, parks, transit, and neighboring communities. A low-stress segment that ends before reaching a destination or forces someone onto a high-stress arterial does not provide meaningful mobility.

Recent local research reinforces this need:
● The San Diego County Civil Grand Jury identified safety and network connectivity as two of the most significant barriers to bicycle mobility and recommended prioritizing continuous facilities, closing network gaps, improving access to transit, and directing investments toward communities with the greatest need.

● The SDSU *State of the Ride* report similarly found that more than 30 percent of San Diego's bicycle network operates under high-stress conditions

A bicycle network should therefore be evaluated based on safety, comfort, connectivity, and access to destinations, rather than the number of miles designated on a map.

2. Create a ranked Mid-City mobility project list

The draft identifies a wide range of worthwhile improvements, including bikeways, traffic calming, safer crossings, transit priority, freeway crossings, and pedestrian improvements. What is missing is a clear framework for determining which projects should happen first.
Create a ranked Mid-City mobility project list using the City's existing Mobility Master Plan prioritization framework, supplemented where appropriate by collision risk, Bicycle Level of Traffic Stress, bicycle and pedestrian demand, transit ridership, equity, access to schools and parks, and network connectivity.

This approach is consistent with the Mobility Master Plan, which identifies pedestrian and bicycle collisions, severe and fatal collisions, equity indicators, and access for people of all ages and abilities as factors in identifying needs and prioritizing projects.

The resulting projects should be incorporated into future updates of the Mobility Master Plan. This would give the City, SANDAG, MTS, and community members a shared roadmap for directing limited funding toward projects with the greatest potential impact.

3. Make transit priority a network commitment

The draft recognizes that transit reliability is affected by congestion on El Cajon Boulevard, University Avenue, Euclid Avenue, and Fairmount Avenue. It supports transit priority measures and identifies opportunities for transit lanes, peak-period transit lanes, shared bus-bike lanes, and a potential center-running bus lane on El Cajon Boulevard.

Unfortunately, many of these recommendations are framed around studying, supporting, or coordinating future improvements.

The final Community Plan should implement the Mobility Master Plan's direction to provide transit priority in roadway corridors and at intersections by establishing El Cajon Boulevard and University Avenue as priority transit corridors, with specific commitments to transit signal priority, queue jumps, dedicated or peak-period transit lanes, and other measures necessary to improve travel times and reliability.

4. Make safety the top priority of a detailed implementation program

Implementation should begin with the projects that address the greatest safety risks.

The Mobility Master Plan states that safety is the City's paramount mobility concern and uses severe and fatal collisions as an explicit project evaluation criterion. The Grand Jury's *Shifting Gears* report also underscores the consequences of an incomplete and inconsistent bicycle network, including locations where facilities disappear precisely where riders encounter the greatest conflicts.

The final plan should use the implementation framework established by the Mobility Master Plan to identify priority, responsible agencies, estimated costs, potential funding sources, and near-, medium-, and long-term delivery timelines for Mid-City mobility projects. Projects addressing fatal and serious injury corridors, high-stress bicycle gaps, unsafe pedestrian crossings, and transit access should receive the highest priority.

The implementation matrix should identify:

Project | Safety Need | Priority | Estimated Cost | Responsible Agency | Potential Funding Source | Delivery Timeframe

This would make it easier to coordinate community plan priorities with resurfacing, the Capital Improvements Program, development impact fees, regional funding opportunities, and SANDAG and MTS investments. It would also support the Mobility Master Plan's stated goal of maintaining a comprehensive project inventory that can be used to plan, prioritize, and budget mobility investments.

5. Link infrastructure investment to planned growth

Mid-City is being planned to accommodate approximately 227,000 residents at buildout. The plan also identifies significant existing and future needs for parks and recreation, including a projected recreation goal of 22,700 value points compared with approximately 6,199 today. The final plan should clearly show how transportation, parks, recreation, libraries, public facilities, and other infrastructure will scale alongside new housing.

We recommend developing an infrastructure-growth framework that identifies what improvements are needed as Mid-City grows, when they should occur, and how they will be funded. This will help ensure that new homes are accompanied by safer streets, better transit, parks, and public facilities that improve quality of life for both current and future residents.
The Draft Mid-City Communities Plan presents an important opportunity to shape one of San Diego's most transit-rich and diverse areas for the next generation. The Mobility Board supports the plan's emphasis on growth, multimodal transportation, and safer streets. The City's own plans, along with the recent Grand Jury and SDSU analyses of the bicycle network, point toward the same priorities: safety, connectivity, equitable investment, and a clear path from planning to construction.

Strengthening the plan's performance standards, project prioritization, transit commitments, and implementation strategy will help ensure that the vision described in the plan is reflected in the infrastructure that gets built.

Sincerely,

Anar Salayev
ATI Subcommittee Chair
City of San Diego Mobility Board

Appendix 27: Boards and Commissions Notes

MOBILITY BOARD
No step down in density to residential area
More density at intersection of rapid stops
Change from community commercial to residential too steep north of ECB
More Community Commercial land uses along 35th street, however Medium 3 and Medium 4 allows corner market
RM-3-7 to 3-9 – retail uses allowed (i.e., food, beverage, groceries, convenience store, sundries, pharmacies, apparel
More dedicated bus lanes – 54th, University, Fairmount
35th street make it a commercial corridor
Separated bikeway on Adams
"Missing to from analysis – Ken-Tal to OB, a transit, biking analysis
Map to show the gaps of proposed corridors and what they do when we encounter there
what do bicyclists do when encounter the Bus-bike Lane?
More emphasis on Vision Zero
Does it analyze vision zero/climate action goals analysis? This is going in the right direction.
Mobility chapter – transit lanes not formatted correctly pg. 123
Align with Mobility Master Plan - Greater emphasis on implementation standards for plan updates or tying into MMP - No tie into MMP – ranked projects, linking infrastructure investment to planned growth - Establishing all ages and abilities for bicycle network (prioritize Class IVs) - Builds on the work of grand jury and SDSU studies
Does city have transit signal priority?

PARK AND RECREATION BOARD
P. 35 - to be consistent w/ PMP - separate the 4 planning gr. Pg 59 PMP/Page 5/pg 19 Appendix C #1-3 communities Plan there are 4
How do we get 800 ..... Updated so neighborhoods without parks get better scores? Not lower
Pg. 34 current RVP: 1,256 are not publicly accessible
Pg. 33 Colina pool is located in Eastern Area not City Heights SS pool should be built near Webster School not in a flood zone. Dig out the lead ash/trash O.P. pool now close to the landfill are holes allowed?
Ranger Station - great idea! Is it in GDP?

P. 32 Adams Rec Center is there room for 5 times bigger Ward Canyon Rec Center is it in GDP? Amendment
Pg 31 City Heights has no gym its acrss the street @ Mid-City
Pg 27 are the 1st 4 existing trails? Only one proposed?
Pg 26 Franklin Elementary currently w/ red yellow green closure
Pg 23 what about the median down Fairmount Ave?
Pg 22 not available its parking for residents for years now
Pg 21 typo - its 49th st. not 40th st.
Pg 19/ 18/17/16/15/14 do all proposed parks need a GDP? Before develop?
Pg 12 Ward Canyon is undergoing a GDP amendment. Kenmore Terrace mini park would need plan amendment
Pg 11 Terrace Dr. Mini Park same as above? Ponce's will not want parking removed. Kensington neighborhood would need plan amendment
Pg 10 O. Park Neighborhood Park convert old snack bar to a restroom ADA... plan amendment
Not this first. N. Chollas Com Park. Like in South Chollas
Pg 10 Chollas [triangle] is in El Cerrito (not City Heights) change design & construct to purchase + construct 60th st series please provide locations future Carver joint use
Pg 9 Pendleton has joint use ballfield not existing and is undergoing partial renovaction * linear park Phase II when funds identified Teralta develop is create? Needs a GDP for both
Pg 8 address for 51st st. mini park. Ash st parcel could be ..... For 47th st fire station. Develop = needs GDP
Pg 7 Teralta potential addition needs plan amendment. Wabash would need plan amendment
Pg 6 Park de la Cruz would need plan amendment. Sunshine GDP is 1 yr and 4 months, M.I.A.
Pg 5 all 5 will need plan amendments!
Pg 4 all 3 will need plan amendments
Pg 3 if you expand the Rec Center 5 times where is the park? Street trees have been requested
Pg 2 N. Chollas does not contain any RC Park but it needs a basketball outdoor built library book spot. J.H. Memorial is getting a tot lot upgrade. Coline does not include gold course - that's run by a nonprofit - Pro Kids Golf would need a plan amendment for upgrades
Pg 1 S. Chollas is designated not dedicated. Do points count if the City Council can un-designate with only 5 votes? (Emerald Hills) There is no public access, so do 1,256 points actually count? Only 2 user groups w/ SUP's

The City of SAN DIEGO

MOBILITY BOARD

Meeting Minutes

Wednesday, September 2, 2026
In Person Meeting: 4:00 – 5:30 PM
Civic Center Plaza, 1200 3rd Ave., 4th Floor Conf. Room
San Diego, CA 92101

Members: Michael Donovan (Mayoral), Haylee Rea (Mayoral), Daniel Reeves (Chair, Mayoral), Harry Bubbins (D1), Stephan Vance (D2), Dr. Lima Saft (D5), Jeff Dosick (D6), Steve Gelb (D7), Anar Salayev (Vice Chair, D9)

Agenda:

Item 1: Call to Order. Roll call.

Chair Reeves called the meeting to order at 4:06 p.m.

Mobility Board Member	Seat	Attendance
Vacant	Mayoral	No
Daniel Reeves	Mayoral	Yes
Michael Donovan	Mayoral	Yes
Haylee Ann Rea	Mayoral	Yes
Harry Bubbins	D1	Yes
Stephan Vance	D2	Yes
Vacant	D3	No
Vacant	D4	No
Lima Saft	D5	Yes
Jeff Dosick *	D6	Yes
Steve Gelb	D7	No
Vacant	D8	No
Anar Salayev	D9	Yes

*This board member appeared remotely.

Item 2: Approval of the Meeting Minutes (Action)

Chair Reeves asked the Mobility Board to review and approve the minutes from its August 5, 2026 meeting.

There were no public comments on this item.

Action: Upon a motion by Haylee Ann Rea and a second by Lima Saft, the Mobility Board voted to approve the August 5, 2026 meeting minutes with seven members in attendance voting "yes" with one abstention to approve the meeting minutes.

Item 3: Non-Agenda Public Comment

One public comment was received sharing an issue with bike lane obstructions from construction and raising a safety concern where detours often force bikes into shared traffic lanes which can often be high speed corridors.

Item 4: Rules Committee Parking Item (Information)

Vicram Vettiyil, Deputy Chief of Staff from the office of Council District 7, shared information on the Ordinance to *Preserve Free Parking at City-Owned Parking Lots That Provide Access to City Beaches and Mission Bay* which was presented to the Rules Committee on August 26, 2026. Mr. Vettiyil shared that the ordinance includes a provision that no fee shall be imposed for City residents who are parking vehicles on City-owned property at beach areas, which would also include Mission Bay. He also stated that the ordinance does not: impact parking lots at leased property such as Sea World or the Mission Bay Hotels; would not impact on-street parking meters or metered parking spaces; would not impact any fine issued for violation of any parking-related regulation; would not prevent the City's ability to regulate commercial activity or permitted events; and that it would require Council to bring forward a proposal to charge for parking and at that point the ordinance would either need to be repealed or changed.

Five public comments were received on this item. Public commenters shared the following: a desire to bring in more revenue for investment in city facilities and operations; a belief that this action is against expert opinion that paid parking should be kept in the City's toolbox as a curb management strategy; that paid parking will allow for more parking spaces to be available and will avoid such uses as long term parking or vehicle storage; and that parking revenue would help patch budget issues and additional revenue would be helpful.

Mobility Board comments included the following: concern over lack of parking access that occurs due to currently unmanaged spaces; suggestions that low-income parking options could be included in future changes; sharing the benefits of curb management and connection with the City's need for more revenue; and stating that parking is a limited resource with high demand. Questions from the Board included enforcement practices for residents vs. non-residents and how that would work.

Item 5: Mid-City Communities Plan Update (Information)

Staff presented the Mid-City Communities Plan Update and provided details on various components of the recently released Draft Plan including land use and economic prosperity, parks and community enhancement overlay zones, and mobility improvements.

Five public comments were received. Public comments included the following: a request to include bus priority on future SANDAG routes for Rapid 10 and on El Cajon Boulevard; a desire for density to address fair housing and connections to safe alternative modes; the need to address concerns with vehicle speeds and the need for traffic calming measures; a request for protected bikeways and multimodal infrastructure and measures to improve pedestrian safety; and a request to continue the analysis of the expanded freeway lid.

Board member comments included requests for more analysis beyond the improvements shown in the community and connecting to further trip origins and destinations. Board members also expressed a desire to add more housing density and to see more detailed transit analysis. Board members also requested information on focus group results and staff shared that the groups generally included positive feedback on land use and displacement policies. Board members also discussed a desire for the Plan to include more safety enhancement measures and to demonstrate progress on both Vision Zero and Climate Action Plan goals. Additionally, members supported use of public space for multimodal needs as well as a desire to connect community commercial areas rather than keeping them separate. Finally, board members discussed the need to better understand gaps in the transportation system.

Item 6: Subcommittee Updates (Discussion/ Possible Action)

6.a. ATI Workplan Subcommittee Activities

Anar Salayev presented the letter from the subcommittee on the Mid-City Communities Plan Update and discussed that the overall approach is to request that the City include an implementation focus and emphasize safety as a priority. One member requested future information about transit signal priority policies.

Action: Upon a motion by Harry Bubbins and a second by Stephen Vance, the Mobility Board voted to submit a comment letter to the City Planning Department on the Mid-City Communities Plan Update. The Board approved this action with seven members in attendance voting "yes" with one abstention.

6.b. Budget Subcommittee Activities

There were no updates from the budget subcommittee.

Item 7: Staff Updates

Staff shared that the City Planning Department is still following up on some transportation facility implementation details from a prior meeting.

There were no public comments on this item.

Item 8: Updates from Members

One member shared an update about library and pool closures because of the budget situation.

There were no public comments on this item.

Item 9: Schedule for Future Meetings

Future Meeting Dates:

- October 7, 2026
- November 4, 2026
- December 2, 2026
- January 6, 2027

Staff shared that upcoming items include the Bicycle Master Plan Update, Streets for All (slow streets) program, and an update from the Port of San Diego on their mobility planning efforts. One board member asked for the inclusion of Vision Zero progress at a future meeting.

There were no public comments on this item.

Item 10: Adjournment

Chair Reeves adjourned the meeting at 5:33 pm. The next Mobility Board meeting is scheduled for October 7, 2026.

CITY HEIGHTS
COMMUNITY DEVELOPMENT

Mid-City Communities Plan Update Community Input

At the August 29, PANA Community Resource Fair, outreach efforts generated strong community interest in the Mid-City Communities Plan regarding the proposed improvements to the Chollas Triangle Located on University Ave. and 54th Street. Attendees engaged with project materials and provided input by voting on proposed projects.

Data Collected:

Recommendation	Yes Votes	No Votes
1. Provide shade for transit stops, improve pedestrian crossings, signage and sidewalks for crossings at intersections.	**21**	**0**
2. High-density residential development throughout the site.	**17**	**4**
3. New store frontages and key corners along University Ave. and 54th St.	**17**	**2**
4. Improve access to nearby parks and open spaces with pedestrian/bike only paths.	**19**	**0**
5. Break down planned block sizes by extending streets and paths.	**17**	**4**
6. Extend Lea St. up to University Ave. with a bike/pedestrian only pathway.	**18**	**1**

Additional Comments and Suggestions

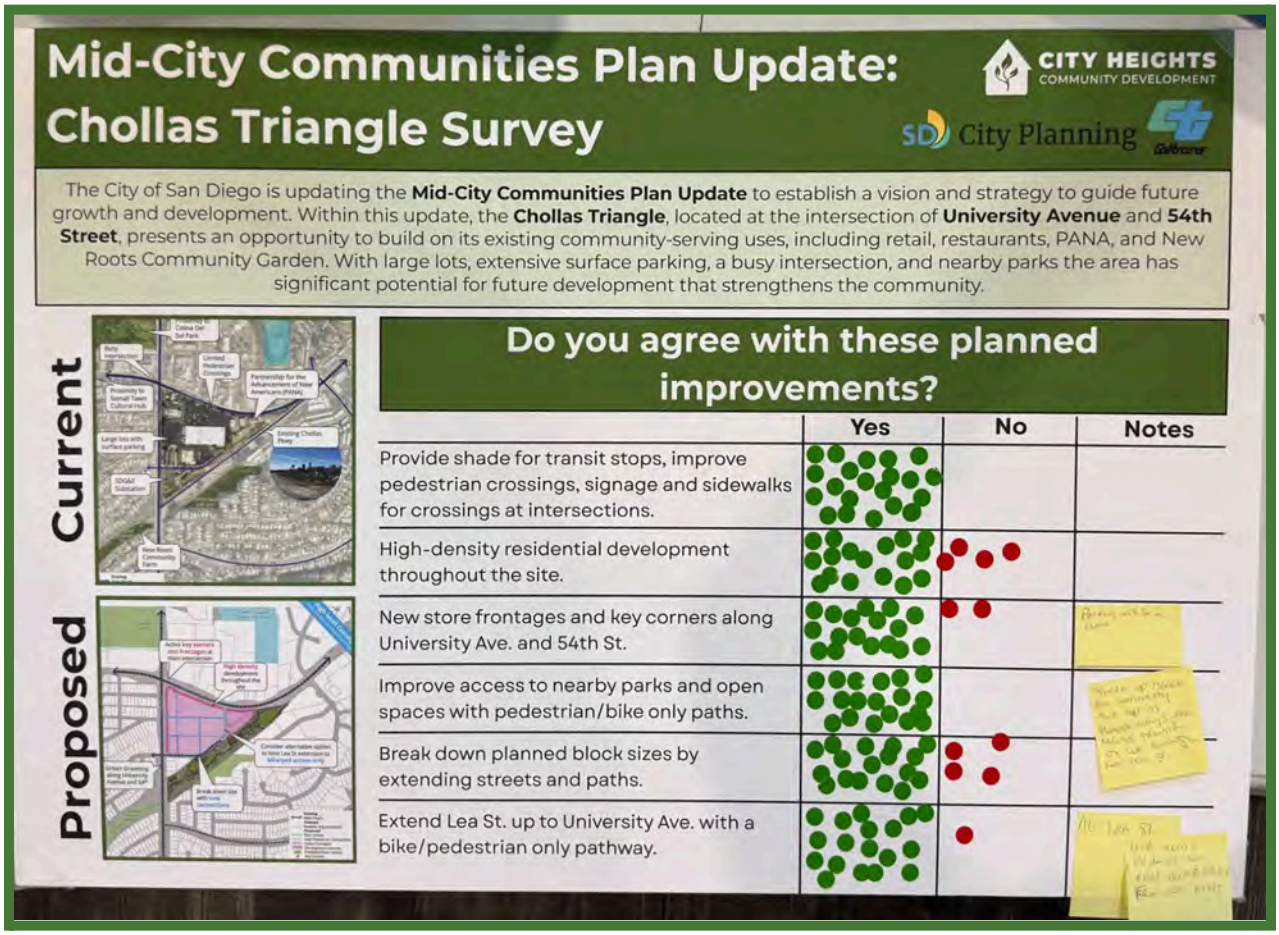
Written Feedback:

- Question 3: “Parking will be an issue” In regards to additional shops along with the planned housing additions.
- Question 4/5: “Break up block for connectivity, but not as through-ways for mass transit or cut through for Lea St.”. In regards to the proposed blocks within the triangle. The participant made clear they did not want traffic from the major streets to be redirected through the site.
- Question 6: “No Lea St.”. In regards to the proposed extension. Clarified in a follow-up note.
- Question 6, follow-up: “We want pedestrian and bike ways for our kids”. In regards to the previous note, clarifying that the participant wanted no additional cars through Lea St. and preferred additional bike and pedestrian space.

Spoken Feedback:

- “Don’t knock down Northgate Market”
- “We need parking”
- Traffic concerns with high density housing
- “No parking already so it’s hard to want new housing”
- Supports breaking down blocks for **parking** and **traffic** mitigation
- Supports Lea St. paseo to help reduce bike accidents on University and 54th.
- “We do not want more cars through the site”
- “When we get off from work we like to walk so the [pedestrian extension] would be good”
- Lots of love to the “Somali Cultural Hub” distinction on the map
- Wording on Lea St. question must leave no room for interpretation, “No cars on Lea!”

Photo of Survey Board



Appendix 29: Focus Groups

BUSINESS IMPROVEMENT DISTRICTS
I spent 5 years working with the College Area Community Plan Update and know how important this is to offer feedback. I will review what you have sent over along with my already completed review of the Urban Design Concept Analysis (I focused on Study Areas 4, 5 and 6). These areas reference the College Area Community Plan frequently. I believe the Mid-City plan will most likely mirror the College Area Plan along El Cajon Boulevard. As usual with Community Plans, much of what they include is predicated on properties changing hands to a new owner who is willing to make the investment for the plan's suggested developments. Given that, I think this draft is moving in the right direction for the areas that affect El Cajon Boulevard in my area. At this time, I do not see any major input needed from me, but after more review, I may have some thoughts. If so, I'll share them with you. Thanks for all of your work with this and I hope I can be more accessible in the future as this progresses.
concern over loss of parking spots for bike lanes, and the effects on small businesses "will fight to death to keep parking" only a certain group who support bike lanes: Its only the advocates and they are walking the corridor trying to get businesses to sign on which none of them have "asking for war on the small business owners"
Auto shops and self storage are useful, on Adams which are neighborhood serving
ideal to get amenities in same time as density (private drive) but public driven so we got to get our priorities straight. In the 80's = "transit first"
Parking loss on Fairmount? (consultant assessing) This will impact businesses They are already impacted
I lived in north park when 30th got taken over and there's only one lane now Bike lanes = traffic Euclid cannot get taken over by a bike lane Can not intrude on businesses, that’s why the city has a budget crisis Please let us know when and where if this happens
Nervous with bike lanes "would be the worst thing for our BID" parking and revenue wise
Worried about Park by the YMCA, bathrooms are a maintenance issue

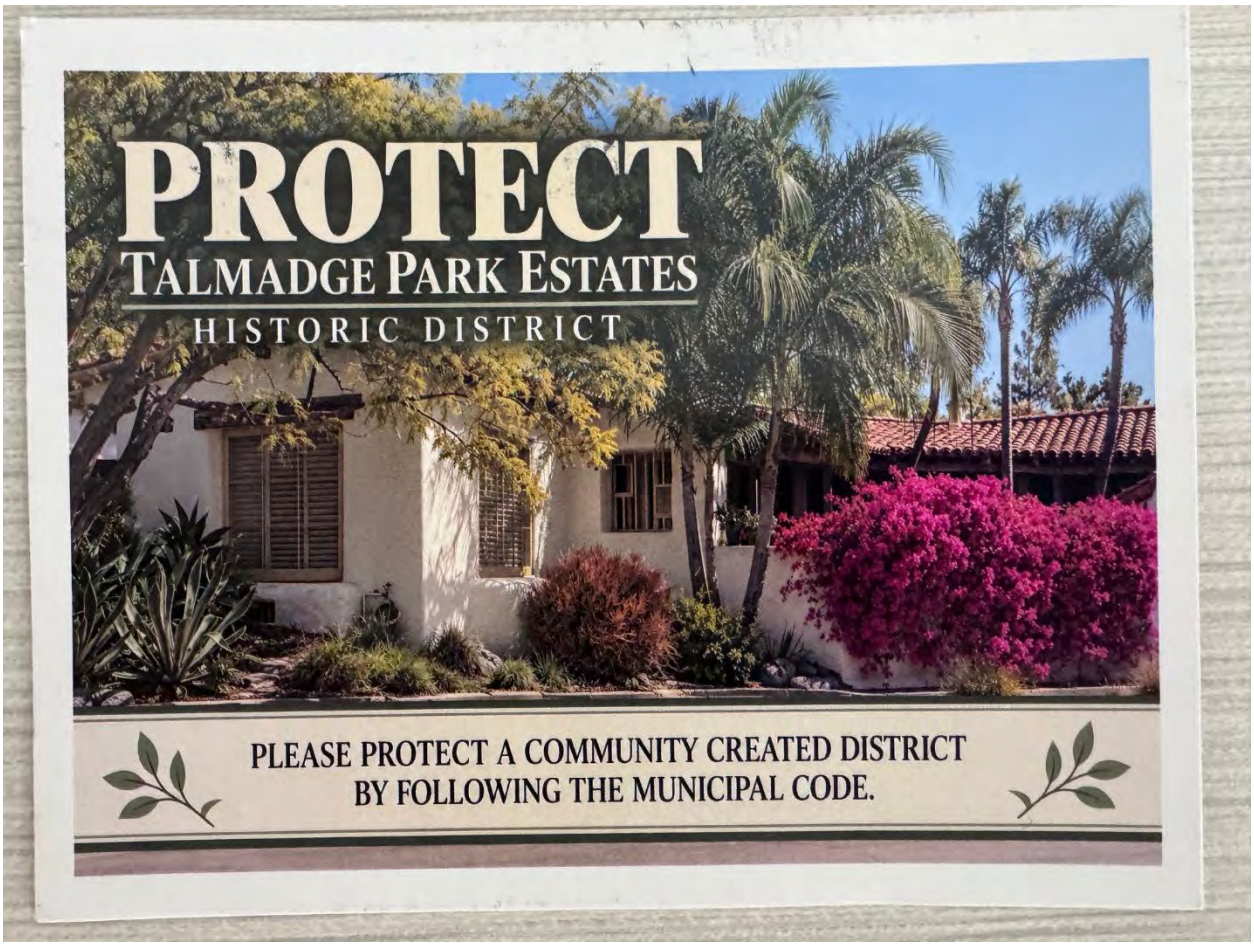
LITTLE SAIGON
Add a policy to revitalize the El Cajon Boulevard and University Avenue transit plazas, with a community partnership for the retail kiosk. Provide secure bike parking, maintain bathrooms and elevators.
Enhance City Heights gateways at El Cajon Blvd, University Ave, Fairmount, and 54th.
Support for pedestrian plazas and outdoor dining parklets.
Support for tactical urbanism projects/quick builds prior to permanent CIPs.
Put a moratorium or SDR to prevent storage facilities
Traffic safety a concern with speeding cars and narrow bike lanes. stronger bike lane projects, but also don't remove parking.
Streeteries – went away
Parklets – alfresco dining
Tactical urbanism…quick build how would we implement it, how we could highlight
Tree bench, long as adjacent property owner is okay and provides insurance- more of that…it's by Lips…
ECB and Marlboro – three car accidents…always speed along my street and they caused accident.
Blvd Transit Plaza and City Heights Transit Plaza, and Concession Activation…$25k permit fee just to get going Caltrans…City took over, but we could not publicize it…
We rarely ever hear, what developer is doing, what the original process, we lost very valuable building in North Park, old Art Deco building, included that in design and went back a month ago, and got rid of the building and gone the next day. No way to reach out and came by our desk. Policy for steps for developers, if they change anything, that should come back to the planning group again.
We don't get notified of project review related thing as a BID. Doesn't recognize it or value what these changes could be (referring to development project that decided not to utilize the Art Deco building façade in the new project). Second party or third party – CEOZ provides the discretionary process if developer doesn't follow up.
How to ensure street safety – Monroe roundabout dangerous (cover of street for all), Fairmount also dangerous.

Appendix 30: Postcards

Count: 88 Received



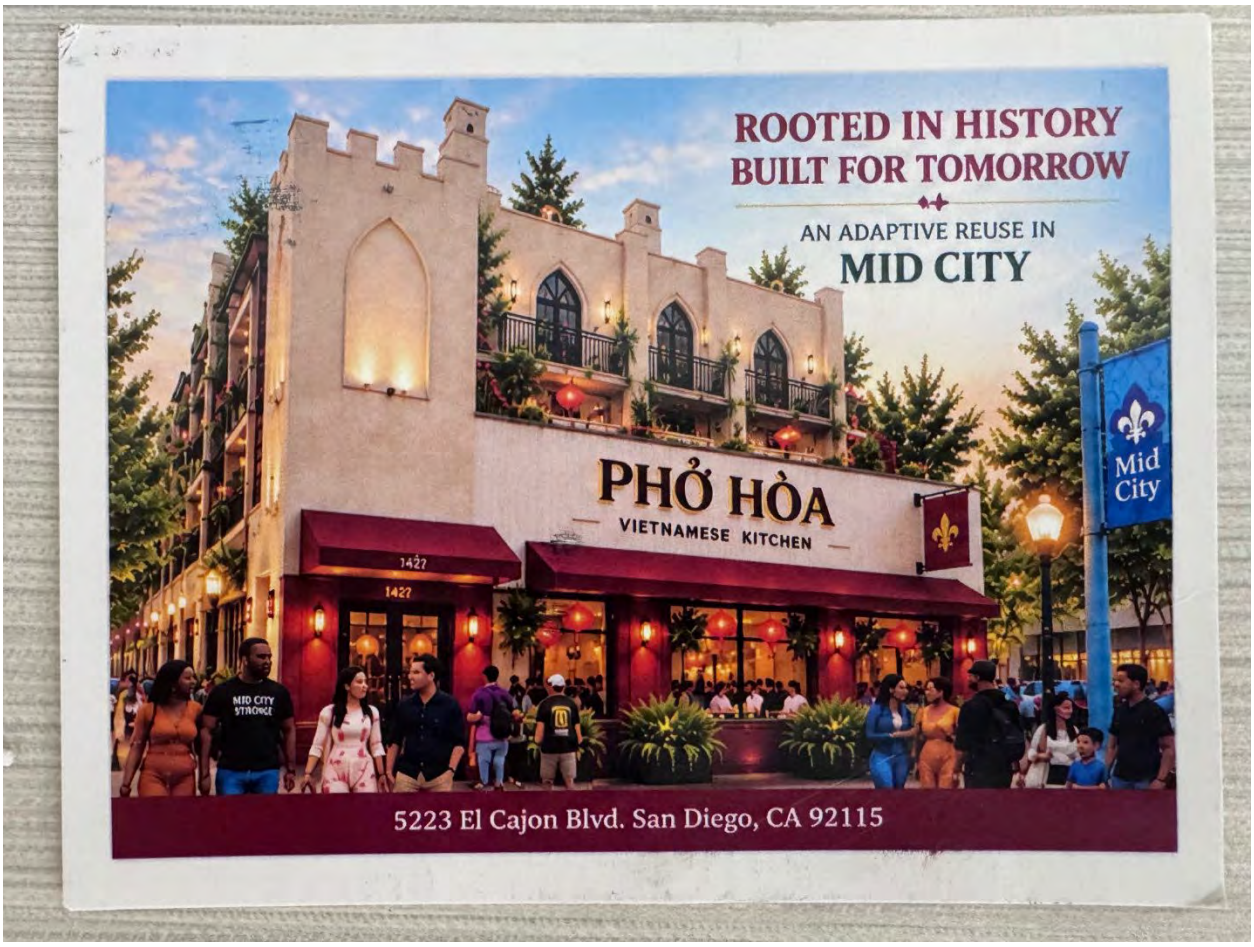
Count:106 Received



Count:120 Received



Count: 62 Received



EMAILS RECEIVED ON FIRST DRAFT

Comment	Commenter
I think we need to consider an additional Future Purple Line Station at approximately 45th St between Quince and Olive Streets, and up-zoning the surrounding station accordingly. Swan Canyon similar to Fairmount Village is predominantly multi family and historically marginalized, unlike other surrounding neighborhoods which are less urbanized and more single family developments such as Azalea/Hollywood Park. Station development would look similar to the Blue Line Pepper Canyon station where there would be columns and a viaduct traversing the canyon before it will need to go below-grade into a tunnel to head north along Fairmount Ave. The distance between the newly proposed Swan Canyon Station would be a mile from the Following University Ave Station, cutting a 30 min, 1 mile walk down significantly; an ideal station spacing for a heavy rail transit line. This is our opportunity to advocate for an additional station and additional housing units in a neighborhood that desperately needs rapid transportation alternatives and currently is not sufficiently served by either the 13 along Fairmount NOR the 7, 10 & 965 along University Ave. Additionally children going to elementary school in the surrounding neighborhood will have the opportunity to ride the Purple Line to Hoover High. If SANDAG is already potentially proposing to build a viaduct structure through the canyon we might as well advocate for a station with bridges that connect the many isolated corners of swan canyon together all around high quality rapid transit.	Raymond Lindeman II

I appose this plan for major development in midcity. This same plan is in progress and Hillcrest and has devastating impact on the Hillcrest residents. Refusing to improve infrastructure to deal with the increased volumes of people has led to increased pedestrian deaths and injury, gridlocked streets to make room for empty unused bike lanes. More than 30 Hillcrest properties sit empty that were scheduled for redevelopment but have since been abandoned after their residents were evicted. For a midcity project of this scale the following most occur first: 3 offsite parking spaces per unit, remove bike lanes, enlarge streets, increase on and off ramps from freeways to accommodate increased traffic, and increase city staffing to service these areas ie, trash pick up, potholes, etc.	Ben Miller
I am emailing regarding the first draft of the mid city plan. Euclid Avenue from El Cajon to Home Avenue is too narrow to be considered a transportation corridor. This creates a dangerous situation for the homes and schools located off of Euclid Avenue. Euclid Avenue needs traffic calming measures to be in place to slow traffic down and encourage traffic to use the larger streets that can handle significant daily traffic like Fairmount Avenue and 54th. Currently Euclid Avenue lacks pedestrian crossings, bike lanes, or sidewalks. There is a 1.5 mile stretch from Home Avenue to University Avenue without a stop sign or stop light causing increasing speed throughout the residential neighborhood. This section of the street cannot absorb anymore density. It needs significant improvement to manage the existing use. Please focus the Euclid Avenue section of the mid city plan on slowing traffic down and increasing green space and pedestrian access.	Graham Wolfe

I am deeply concerned about the exploitation of Mid-City by the developer abuse of the egregious laws enforced by the city and state. Much of Mid-City, in the past, had been a naturally affordable area but since the zoning changes, it has now become very expensive and the lack of parking in some areas is a safety concern. Another safety concern is the stain on the fire department and police station. The homeless population in this area (especially Golden Hill), unfortunately, has increased significantly, adding additional strain to first responders. The city has not added any new fire in Mid-City to help support all of the building. I have a condo at 4530 Idaho Street, 92116, Next door, on a 7,000 square foot lot, an 8-story, 49-unit complex is being constructed. We have endured a year of noisy and dirty construction and have another year to go. Behind us (sharing the same alley) at 4517 Oregon Street, a 9-story, 48-unit (only 2 affordable units) has been approved. These two developments (see pics below) were approved under Complete Communities, which is ruining North Park/U Heights. These once naturally occurring affordable areas, are now very expensive. These developments wiped out SFRs or lots that had 5 units on them and now will forever be apartments, offering no ownership opportunities, while overcrowding an already crowded area. As you continue to plan for Mid-City growth, please consider that this area is already crowded. We do not need another downtown, as downtown and East Village have some of the highest vacancy rates in the city. People want lower density and the changes in zoning are wiping out historical and lower-density homes in the Mid-City area.	Della June

I’m reaching out regarding a property in the City Heights community that I believe could present an opportunity to expand green space and enhance the surrounding Central Avenue park area. I recently contacted Councilmember Sean Elo-Rivera’s office to propose that the City consider acquiring the property and incorporating it into the existing park. Diana Frias, City Heights Community Representative with Councilmember Elo-Rivera’s office, recommended that I submit the proposal to the Mid-City Plan Update team, particularly because of the plan’s focus on green spaces. The property is currently available and I believe it could provide an opportunity to create additional green space, improve access to recreational areas, and provide more opportunities for community events and activities. Please find the video tour below of the vacant lot and photographs attached. Video Tour LInk Thank you for your time and for your work toward improving green spaces and community resources in the Mid-City neighborhoods. I appreciate your consideration and would be happy to discuss the proposal further. Warm regards, Samantha Manjarrez	Samantha Manjarrez
On behalf of the El Cerrito community, I'm writing to formally request a correction to the Mid-City plan update draft's map. El Cerrito is reflected as including the triangular piece of land north of Chollas Parkway, east of 54th where Northgate Market and other buildings are located. Those who live in El Cerrito, associated with planning, have never seen this piece of land reflected as being part of El Cerrito, in fact basic internet searches and the City of San Diego website (including D9's) demonstrate the land is not part of El Cerrito and suggests its part of Oak Park or Redwood Village. We are finding that El Cerrito is underrepresented for planning and it's reflected through things like the map and other coordination with the city through the current Eastern Area group. Please see the attached document for additional context. For future-state, we'd (El Cerrito) like to request formal inclusion in planning for the Mid-City plan in relation to our community.	El Cerrito Neighborhood Group

1. Resource Allocation and Prioritization: Per the CTCAC map, El Cerrito is designated as a low-resource area. However, we often hear that other areas within the Mid-City/Eastern Area are lower-resource, and the prioritization of those areas (such as City Heights and Chollas) appears to be reflected in the draft plan, while El Cerrito seems overlooked. (Map link: https://belonging.berkeley.edu/2026-ctcachcd-affh-mapping-tool)	El Cerrito Neighborhood Group
2. Chollas Triangle Boundary & CIP Priorities: The Chollas Triangle is labeled as El Cerrito in the draft plan, but it is designated as Redwood Village/Darnall in all other source maps, including the CTCAC map and the City's own District 9 community maps. Consequently, El Cerrito's Capital Improvement Program (CIP) priority is incorrectly listed as the Lea St. Connector. We are currently working with the city to amend our CIP priorities, as the Lea St. Connector is not one of them. We appreciate the boundary line being adjusted to accurately reflect the Chollas Triangle within Redwood Village. - Supporting Map Links: - CoSD D9 El Cerrito (https://www.sandiego.gov/citycouncil/cd9/communities/elcerrito) - CoSD D9 Redwood Village (https://www.sandiego.gov/citycouncil/cd9/communities/redwood-village) - Eastern Area Communities Planning (https://easternareacommunitiesplanning.com/)	El Cerrito Neighborhood Group
3. Housing vs. Population Growth: SANDAG forecasts a modest 0.3% population growth for the Eastern Area (including El Cerrito), yet an 11.8% increase in housing is planned. While the population across Mid-City has dipped, more housing is being proposed with few anticipated residents. There is a critical need for targeted economic development to support the rationale for the planned housing growth.	El Cerrito Neighborhood Group
4. Growth Documentation (Page 9): The draft references a lack of parks, schools, and public facilities carried over from the 1998 plan and notes that Mid-City has since seen significant growth. However, El Cerrito has not experienced this same growth or infrastructure change.	El Cerrito Neighborhood Group
5. Planning Overlap: El Cerrito frequently falls into the service area for the College Area plan, yet it is not acknowledged within the College Area community plan document. This leaves El Cerrito in a "no man's land" regarding community facility planning.	El Cerrito Neighborhood Group

6. Equitable Development (Page 14): The draft plan references equitable development, but we do not see equity in the development strategies allocated for El Cerrito.	El Cerrito Neighborhood Group
7. Historical Preservation (Page 47): El Cerrito is rarely viewed as a historical area in need of preservation like Kensington or Talmadge, but we believe this should be reconsidered. While the draft references retaining historical buildings, there is nothing specific to El Cerrito. Our neighborhood's charm relies heavily on its unique architecture built from the 1920s through the 1960s, featuring notable historical homes and community relics.	El Cerrito Neighborhood Group
8. Mobility Networks (Pages 120 & 122): The planned pedestrian network shows very little coverage in the Eastern Area, and the bicycle network infrastructure is nearly non-existent.	El Cerrito Neighborhood Group
9. Parks and Open Space (Page 139): The draft references parks, trails, and open spaces, but lists nothing within El Cerrito. We have identified a viable opportunity: the empty lot adjacent to the Colina swimming pool (off Orange Ave and 54th Place) could serve as an ideal location for a park, play area, skate park, or amphitheater.	El Cerrito Neighborhood Group
10. Library Planning (Page 145): The draft references libraries and places El Cerrito in the College Rolando library service area, which is correct. However, there is very little planning details regarding future growth and needs. Nathan, from your team, likely has additional context from the College Area plan that could be integrated here.	El Cerrito Neighborhood Group
11. Crawford High School Joint-Use: Due to the lack of parks in the area, we request a joint-use agreement to allow community access to the track and field for exercise.	El Cerrito Neighborhood Group
12. Mann Indoor Soccer Joint-Use: We request joint-use access or rental options for this facility to help offset the lack of neighborhood recreational spaces.	El Cerrito Neighborhood Group

13. Zoning and Neighborhood Character: We would like to see limits placed on smoke shops, used car lots, and massage parlors to a maximum of one of each type, or none. In such a small area, there is no need for more than one, if any. The used car lots are ripe for community development. Also, the plan should incentivize restaurants with outdoor dining and boutique shops to support a vibrant, walkable neighborhood to match the needs as there are many families, working professionals and couples who want local eateries and shops to walk to.	El Cerrito Neighborhood Group
14. Property Maintenance: The plan should include mechanisms requiring landlords to maintain their properties and landscaping.	El Cerrito Neighborhood Group
15. Aesthetic Requirements: We request stronger design requirements and enforcement for new construction to ensure new projects match the established 1920s–1960s neighborhood architectural style.	El Cerrito Neighborhood Group
16. Boundary Development: Future community improvements and economic development should focus more heavily on El Cerrito's primary boundaries (El Cajon Boulevard, University Avenue, 54th Street, and College Avenue).	El Cerrito Neighborhood Group
17. Community Recognition: Throughout the plan, wherever El Cerrito is currently unacknowledged, we request that studies be conducted to determine how changes can benefit the community while retaining its unique character.	El Cerrito Neighborhood Group
attached, please find the CIP priorities we shared with the D9 team in light of our transition and the mislabeling of the Lea St. Connector as our priority. Some of those items may need integration into the plan - happy to discuss.	El Cerrito Neighborhood Group

I am writing to submit my formal public feedback regarding the first draft of the Mid-City Communities Plan Update. As the city looks to promote walkability, bike ability, and climate-resilient active transportation, I want to formally propose the inclusion of a dedicated Class 1 pedestrian and bicycle bridge across the I-15 freeway to reconnect the neighborhoods of Fairmount Park and South Park. Historically, the construction of the regional freeway network heavily fractured our local street grids. Today, the Fairmount Park neighborhood finds itself highly isolated, severely cut off from adjacent communities by three major freeways (the I-15, SR-94, and I-805). While Fairmount Park residents live directly across the freeway corridor from the vibrant commercial, transit, and open-space networks of South Park and Greater Golden Hill, there is currently no safe, direct, or realistic way to walk or bike between these two areas. To meet the ambitious goals of the City's Climate Action Plan, our infrastructure must provide safe, pleasant alternatives to vehicular travel. A dedicated pedestrian and bicycle overpass bridging the I-15 would directly solve this challenge by: • Reconnecting two historically severed historic neighborhoods. • Providing Fairmount Park residents safe, vehicle-free access to South Park's amenities. • Creating a continuous active transportation loop linking local canyon trails. • Enhancing park and infrastructure equity for an isolated community pocket. Given that city working groups have already begun exploring freeway-spanning pedestrian connections, I strongly urge the planning team to officially evaluate and incorporate this Fairmount Park-to-South Park active mobility connection into the final Mid-City Communities Plan Update. Thank you for your time, dedication to our community, and consideration of this critical infrastructure	Kevin Schaer (Fairmount Park)

I am writing to provide specific public feedback on the first draft of the Mid-City Communities Plan Update, with explicit reference to the "Street Tree Corridors" concept outlined on Page 64. I strongly support the City's vision to develop dedicated street tree corridors to combat the urban heat island effect and improve neighborhood walkability. However, to ensure the long-term sustainability and survival of these trees without straining our potable water supply, I propose that the City explicitly incorporate passive stormwater-harvesting infrastructure directly into the design guidelines for these corridors. Specifically, the city should look into the community-led model pioneered by the Dunbar/Spring Neighborhood Foresters in Tucson, Arizona (https://dunbarspringneighborhoodforesters.org/). By utilizing street curb cuts, curb cores, and roadside basins, they successfully redesigned standard street parkways into active rain gardens that irrigate a dense canopy using free street runoff. To see a direct visual demonstration of how this infrastructure works and impacts a neighborhood, I highly encourage the planning team to watch this brief documentary detailing the project: Free Water Rainwater Harvesting Pioneer (https://www.youtube.com/watch?v=lQ-jdUGCxcc). Integrating this water-harvesting framework into the Page 64 Street Tree Corridors would directly achieve multiple city goals by: • Using free urban stormwater runoff as the primary irrigation source for the new corridors. • Maximizing the growth, canopy size, and health of native, low-water-use trees. • Preventing localized street flooding by capturing and filtering runoff before it enters the storm drains. • Lowering neighborhood temperatures significantly to fight the urban heat island effect. I urge the planning department to amend the guidelines on Page 64 to require or incentivize curb cuts and	Kevin Schaer (Fairmount Park)

Thank you for your vision in creating more affordable housing closer to the center of America's Finest City. However, besides finding shelter, parking and traffic are also enormous burdens on our citizens. The proposed planning of a large housing complex in City Heights will be a congestion disaster unless the city requires two off street parking spaces for each residential unit, tears out the traffic circles on University Avenue and widens University Avenue back to 4 lanes. I encourage each of you planners and decision makers to drive around University Avenue during morning and evening rush hour as well as around 7 PM to image you living in the planned high density residential development trying to commute and find parking with hundreds of new residents. San Diego is not New York with a robust and rapid public transportation network. Please drive I-805 and I-15 between CA-94 and I-8 during morning and evening commute hours. Please take public transport during c	Bob Hickman
We don't see the Kensington MADS on the 2-4 figure of the Mid-City Community Plan First Draft August 2026.	Lisa Stone & Priscilla Berge
BuildSD prepared a draft land use plan and requested a meeting to discuss.	Build San Diego

I am the property owner of 4082-88 51st Street, San Diego, CA 92105, in the City Heights community. I'm reviewing the First Draft of the Mid-City Communities Plan Update and would like to understand how it affects me. 1. What is the proposed land use and density designation for this parcel, and is it a change from the current (1998) community plan designation? 2. If the designation changes, what would that allow me to build on the property that I currently cannot (e.g., additional units, increased height, mixed-use)? 3. Are any nearby parcels, corridors, or blocks slated for higher density or redevelopment that could affect the character of this immediate area (traffic, building heights, etc.)?	sean de gruchy

At our meeting you offered to mention the concerns anyone has at the Working Group Meeting. On page 13, Land Use, the map proposes to change Euclid Avenue, south of Landis to the paper street of Redwood, from a residential zone to a commercial zone. Islenair and Fox Canyon oppose this change. The current zone allows for residential with some small business activity, or 100% residential if the property owner has no interest in putting in a business. We've been successful in changing an auto repair into beautiful duplexes and another property built a duplex as well. So there is interest in building residential units on this section of Euclid. Also the type of businesses Euclid attracts are liquor stores and smoke shops.Not neighborhood serving commercial. Twenty five years ago the city wanted this same change to commercial from residential. The community opposition to this change resulted in the award winning Euclid Avenue Revitalization Action Plan and a new residential zone. Please keep us residential so we may continue to revitalize the entire Euclid Avenue Corridor in a consistent manner. One final note: Euclid Avenue from Home Avenue to El Cajon Blvd should be designated a Green Corridor. That's what the Euclid RAP envisioned, traffic calming and street trees throughout the Corridor. Euclid is one of two north south streets thru City Heights, (Fairmount the other)and it deserves to be shown some love! At least that's what the 100 people who wrote the Euclid RAP thought then and still think today!	Patty Vaccariello

I'm reaching out regarding a small vacant parcel at 0 Dwight Street, San Diego, CA 92105 (APN 454-161-32-00), located adjacent to Central Avenue Mini Park. I've been following the Mid-City Communities Plan Update and the City's work to identify opportunities for additional parks, pocket parks and open space. Given the timing of the current draft plan, I wanted to bring this particular parcel to your attention for consideration. The property is approximately 5,590 square feet, is currently vacant, and the owner is interested in selling. Because of its relationship to the existing Central Avenue Mini Park, it may present an opportunity to expand or enhance an existing City park asset rather than establish an entirely separate site. I've attached a one-page overview showing the parcel, its location relative to the existing park, and some additional context. Would your team be willing to take a look and consider whether the parcel merits evaluation as part of the Mid-City planning process or as a potential future park acquisition? If this should be reviewed by Parks & Recreation, Real Estate Assets, or another City group, I'd greatly appreciate your help routing it to the appropriate person. I'm happy to provide any additional parcel, ownership, pricing or site information that would be helpful.	Chris Rich

In addition to Mike Baldwin's comments Monday night at the Kensington Community Church Planning Group meeting, which he has sent to you, I'd like to reiterate the two concerns I raised: 1. Insurance Crisis: Like other areas, our residents have had canceled polices and difficulty getting new insurance. We've been told by Verisk, which assess risk for many insurance companies, density is a significant rating factor. The more homes packed into an area, the greater the fuel load— the faster a fire jumps from one home to the next. Increasing density in high fire zones therefore doesn't just put more lives and property at risk. It will also drive up insurance costs for all of us and will force even more homeowners into the expensive, low-coverage CA FAIR plan or to go bare. 2. Water Limitations: There wasn't enough water available to fight the disastrous 1985 Normal Heights fire which destroyed 76 cherished homes. But that's not ancient history. According to firefighters we spoke with several years ago, during a training exercise in that very same area, there wasn't enough water to support even the exercise. One firefighter told me, "If a major fire occurred that day—we probably couldn't have put it out. This should be a giant flashing red light on the plan. If our water system may already be inadequate, and we're facing a future where lawsuits and even wars may be fought over diminishing supplies of water, what happens when a fast-moving wildfire hits a neighborhood with even more homes—and more people—packed into it? We should not add density to high-fire-risk areas while ignoring the most fundamental question of all: will firefighters definitely have enough water to save a growing "us"? That answer can't be dependent on overly optimistic future water supplies, or phantom funding. I am begging you: protect our residents. Reduce the density goals in all of the high-fire-hazard areas before we create a disaster we cannot undo	Judy Harrington

I am writing as President of the Kensington Fire Safe Council regarding the First Draft Mid-City Communities Plan. The comments and specific requests made in this official ”on-record” request are exactly what I spoke about and requested of you verbally during my presentation on September 21 at the Kensington Community Church. To reiterate my overarching point from the 21st, - We believe this plan has not addressed sufficiently the life and safety impacts of existing residents, (or the added residents envisioned by the plan) in a serious and transparent effort. We believe there are serious evacuation and access implications affecting the life and safety of our residents that need to be considered as a cornerstone and primary objective of any plan for the future. As such, confirming my requests made on Monday evening, The Kensington Fire Safe Council requests that the additional mobility and environmental work supporting the Second Draft include a quantitative, location-specific analysis of wildfire evacuation capacity and simultaneous emergency-responder access in Kensington, Talmadge and other at-risk communities in the Mid-City area. The first draft acknowledges substantial wildfire exposure and proposes increased residential capacity, but it does not provide route-specific modeling showing whether Kensington’s constrained street network can accommodate evacuation under wildfire conditions. The statement that most proposed land-use change would occur outside the Very High Fire Hazard Severity Zone does not resolve this issue: residents may still need to travel through constrained streets and intersections, areas potentially made worse by the development and added population density envisioned by this plan. Development which is concentrated precisely in critical evacuation routes for the existing community. We request that the analysis: 1. Evaluate Kensington (and other at risk communities like Talmadge) separately rather than relying solely on Mid-City-wide averages. 2. Compare existing conditions with reasonable buildout under the proposed land-use designations, using realistic assumptions about residents, household vehicles, visitors and on-street parking. 3. Model credible canyon-fire and wind-driven-fire scenarios, including evacuations initiated from different	Mike Baldwin

I own the property at 1404 38th Street, San Diego, CA 92105 (APN 540-572-18-00) in the Fairmount Park area of City Heights. I appreciate the work that has gone into the First Draft, and I am writing to request that my parcel be designated Medium Residential 3 (56–73 du/ac), or at minimum Medium Residential 2 (45–55 du/ac), in the Second Draft. The site is unusually well suited to additional homes: • Large lot: about 13,939 sq ft (0.32 acres), made up of three legal lots (Lots 15–17, Block 31, Map 517, Marilou Park). That is roughly twice the size of a typical lot in the area. • Long street frontage: about 240 feet along 38th Street, which allows an efficient, well-designed multifamily project with good street presence and room for greenways and landscaping. • Already multifamily: the site is zoned RM-1-1 and has a 4-unit building from 1979. Increasing density here adds homes without converting single-family neighborhoods. • Consistent with the plan's goals: the parcel is within the Fairmount Park / Home Avenue study area and close to the Home Avenue corridor. It can support the plan's objectives for a range of housing types, affordable homes, and a graduated transition from corridors to neighborhoods. Under the current RM-1-1 zoning, the site is limited to 4 units. A Medium Residential designation would let a single parcel with one owner deliver a meaningful number of new homes, including affordable units, in a location where assembling land is otherwise difficult. If the site is redeveloped, I am committed to working with current tenants consistent with the City's relocation and right-to-return policies (Draft Policies 2.9–2.11).	David Lamb

I attended the public meeting in Kensington on September 21, 2026. My observation is that the current infrastructure will not be sufficient to accommodate the proposed density of dwelling units in the plan update. The influx of new residents cars will not fit in the current street layout and thus it is necessary for new multifamily developments to provide on site parking, preferably below ground, contrary to what is currently allowed. The historic nature of the old neighborhood will be lost too, and I believe we need to preserve the individuality of the neighborhood but with carefully planned infill density increase. The Kensington Talmadge planning group prepared an alternative plan for density increase in this midcity area which meets State requirements for density and is much more sensitive to the needs of the existing residents of this part of the city. I support their proposal and not that of the draft mid City plan update.	Mary Radley
Dear Ruby and City Planning Team: Thank you for the opportunity to comment on the Draft Mid-City Communities Plan. I am writing specifically from the perspective of Normal Heights. I support the central idea that our neighborhood in Normal Heights should evolve. We need safer streets, more trees, more public spaces and more opportunities for people to live close to schools and the places they work, shop, and gather. But I believe the measure of this plan should be larger than how many additional housing units it makes possible. My highest priorities are to make Normal Heights dramatically more walkable and shaded while ensuring that the people who already live here can stay and enjoy those improvements. As the City considers the future of Normal Heights, I ask the City to carry four priorities into the next draft: 1. Make resident stability a measure of success. Growth and density in Normal Heights should create room for new neighbors without unnecessarily displacing the people who already live in Normal Heights. A healthy community plan should be capable of making room for both existing residents and future residents, so they all belong without the fear of displacement. As new housing is added, the city should also have a clear strategy for preserving existing housing and be monitoring displacement, renter stability, and a plan for housing preservation.	Madeleine Baudoin

2. Treat Adams Avenue as the social heart of Normal Heights. Adams Avenue works because people hang out and encounter one another there. It is the backbone of our community. The place where people go to the grocery store, restaurants, yoga studios, the post office, cafes and hair salons. Most of the businesses along Adams Avenue are locally owned businesses and create repeated opportunities for people to see one another, do business, and develop relationships. These seemingly ordinary encounters are part of the infrastructure of a thriving community like Normal Heights. As Adams Avenue grows, new development should strengthen the quality of life that already exists through active ground floors, smaller storefronts, inviting sidewalks, pocket parks, outdoor seating, trees and places where people can sit, hang out and be together. More housing and density along Adams Avenue should result in more neighborhood life, and connection.	Madeleine Baudoin
3. Connect growth to visible improvements in everyday life. Growth is easier for a community to embrace when people can see and experience how it contributes to a better neighborhood. More density should bring more trees, more public spaces, and traffic calming measures along Adams Avenue and surrounding areas. Is there a way we can communicate this better in the plan? I also support the addition of a modern library in our neighborhood that the residents and schools can use.	Madeleine Baudoin

4. Make walkability and shade essential infrastructure. Normal Heights is already a walkable and densely populated community. As it grows, walking should become safer, easier and more pleasant. That means traffic calming, wider sidewalks, and comfortable connections among homes, Adams Avenue, schools, parks and community facilities. It also means taking shade seriously. Shade affects whether someone chooses to walk to the store, wait for a bus, walk a child to school or spend time outside. The City should establish measurable tree-canopy and shade goals, with the long-term aspiration of making Adams Avenue a nearly continuous shaded pedestrian corridor. I think thirty years from now, the measure of this plan should be whether people of different incomes can still live in Normal Heights, participate in neighborhood life, encounter one another, feel that they belong, and whether the things that make Normal Heights such a wonderful community, continue to grow stronger, healthier, and better with the change. If we can accomplish that, we will help create the conditions in which the community of Normal Heights can continue to flourish. Thank you for your consideration and for your care in planning the future of Normal Heights.	Madeleine Baudoin

Hello Mr. City Government, I have been a resident of Mid-City for over two years, and I want to thank you for updating the community plan. I would like to support including more housing throughout the plan area, particularly centered around the Kensington neighborhood. Additionally, I encourage adding smaller community amenities throughout the area, such as pocket parks. Regarding transportation, I strongly support installing a high-quality bike lane on Adams Avenue, along with improved protections for bicyclists on major corridors like University Avenue, El Cajon Boulevard, and Meade Avenue. As a rider who uses a recumbent bike due to a disability, current safety conditions prevent me from riding on these streets and limit my mobility in my neighborhood. Thank you for your time and consideration.	Jay Robinson-Duff

Good afternoon- I live in Kensington, south of Adams. I am very concerned about the plan to increase density due to extreme fire danger. We are surrounded by very dry canyons which are often frequented by the homeless. The traffic in Kensington is a problem because of the extremely narrow streets. Residents park on the street often because they don't have a garage at all or their car won't fit in their car existing garage. As a result, if you drive on many of the streets, you need to pull over to let opposing traffic pass. One block that is especially bad is the first block of Marlborough, south of Adams. If there were a fire NOW, it would be gridlock getting out of Kensington and allowing first responders into Kensington. The situation would be significantly worse if the city proceeds with the plan for increased density in Kensington. It is not hyperbole to say that in the event of a wildfire, lives will be lost in an attempt to evacuate the area. Significant parts of Kensington are in Very High Fire Risk areas. Please reconsider your plan. Thank you.	Theresa McKenna
I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, wh..	Jan Taylor

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	John Walsh

I am writing to express my opposition to the City's Mid-City Communities Draft Plan as it applies to the Kensington-Talmadge area. I support the KTPG Alternative Plan because it offers a more balanced approach to growth while preserving the character and livability of our community. Please note: I am a long-time urban planner with deep roots in helping to advance affordable housing. Specifically, I support a plan that: • Directs higher-density housing to transit routes and commercial corridors rather than established residential neighborhoods. San Diego has few neighborhoods that reflect its historic character. Protecting and preserving historic resources should be an important priority for the city. If historic neighborhoods are destroyed, a precious portion of the city's legacy is destroyed. • Preserves existing residential zoning while recognizing that ADUs, SB 9, and other state and local housing programs already provide opportunities for additional housing. • Requires parks, libraries, community facilities, and other infrastructure to keep pace with growth. • Provides housing options for residents at all stages of life, including young professionals, first-time homebuyers, families, and seniors. • Maintains safe and accessible evacuation routes during fires and other emergencies. Please record my opposition to the City's Draft Plan and my support for the KTPG Alternative Plan.	Pat Libby

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan and register my support for the KTPG Alternative Plan.	Ralph Hanna

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As you could see by the overflow capacity crowd at the Kensington Planning meeting, the draft plan you have proposed has many of us concerned. The easy answer is to blame all the required changes on “SB79” – but our Kensington Planning Group has studied this thoroughly, and has proposed several solutions that seem much more reasonable, and take into account the increased density programs already available in our neighborhoods (such as the ADU and Bonus ADU plan). It also has re-distributed the density to existing areas more ready to accommodate it – with better existing infrastructure. Please consider all their suggestions and recommendations. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	David Outz

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Flo Pierce
I oppose the City's Mid-City Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan. This Alternative Plan addresses and resolves my key concerns that the city plan omits, such as focusing new density on and near transit and commercial corridors, rather than deep within established neighborhoods such as mine. Please record my opposition to the City's Draft Plan and register my support for the KTPG Alternative Plan.	Leslie Zoref

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I am writing to express my opposition to the City's Mid-City Communities Draft Plan as it applies to the Kensington-Talmadge communities. Instead, I support the Kensington-Talmadge Planning Group (KTPG) Alternative Plan. The KTPG Alternative Plan provides a more thoughtful approach to accommodating growth while preserving the established character and history of our neighborhoods. In particular, I support a plan that: • Focuses new density on and near transit routes and commercial corridors rather than placing significant new density deep within established residential neighborhoods. • Maintains existing residential zoning. ADUs, SB 9, and other state and local housing programs already provide opportunities for substantial additional housing in these communities. • Requires infrastructure and public facilities to keep pace with growth, including parks, libraries, and other community facilities. • Recognizes and protects potential historic districts and historic resources, while acknowledging the existing locally designated State and National historic districts.	Patricia Benjamin

I am particularly concerned about the impact of the City's proposed plan on historic homes and neighborhood character. I live in an historic home at 4537 42nd Street, built in 1920. Under the current Draft Plan, I am concerned that homes such as mine could ultimately be demolished to make way for high-rise development or become surrounded and effectively trapped between much larger buildings. This would fundamentally change the historic character and scale of the neighborhood. I am also concerned about the implications of increased density for fire safety and emergency evacuation. The area has recently been identified by the State as a "zero-zone" fire area, and the Kensington Firesafe group has raised concerns about evacuation difficulties during a wildfire. Increased development and population density could place additional pressure on already limited streets and evacuation routes. Parking is another existing concern. Street parking is already limited, while ADUs continue to be constructed without necessarily providing additional on-site parking. Further intensification could increase congestion and make emergency access and evacuation even more difficult. Growth should be accompanied by the infrastructure, public services, transportation improvements, fire-safety measures, and planning necessary to support it. It should also respect the historic resources and established character that make Kensington-Talmadge a unique community. For these reasons, I respectfully ask that the City reconsider the current Mid-City Communities Draft Plan and give serious consideration to the KTPG Alternative Plan. Thank you for taking the time to listen to the concerns of residents and for considering an approach that balances housing needs with neighborhood character, historic preservation, infrastructure, and public safety.	Patricia Benjamin

I'm writing to express my opposition to the City's Mid-City Communities Draft Plan as it relates to the Kensington-Talmadge communities. I support the KTPG Alternative Plan https://c92f4009-7cd5-46ff-8380-2badc9a02bbd.usrfiles.com/ugd/c92f40_e3ea5f0edd5f48698bbb935e3032941c.pdf because I believe it takes a more thoughtful approach to future growth in our neighborhood. Specifically, I support a plan that: • Concentrates new housing and density around transit and commercial corridors rather than pushing additional density into established residential neighborhoods. • Keeps the existing residential zoning in place, especially since ADUs, SB 9, and other state and local programs already provide opportunities for additional housing. • Makes sure infrastructure keeps pace with growth, including parks, libraries and other community facilities. • Recognizes and protects historic resources and potential historic districts, including the existing State and National historic districts in our community. • Creates a neighborhood that works for people at every stage of life, including first-time homebuyers, families and seniors. • Protects safe and reliable evacuation routes in the event of a wildfire or other emergency. Please record my opposition to the City's current Draft Plan and my support for the KTPG Alternative Plan. Thank you for considering the concerns and priorities of our community.	Alison Lundberg

We oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, we support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Wildfire and its spread in our community, evac routes, and fire safety are our first concerns. Our property has no driveway in which to park, so parking in our already-parked-out neighborhood is our second. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Jeanie Camp

I strongly oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the Kensington-Talmadge Alternative Plan, which nurtures communities; protects single family homes from commercial exploitation; furthers options for truly affordable housing; and better addresses major fire-safety, emergency egress and ingress, and infrastructure needs. The Kensington-Talmadge Alternative Plan - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. Please record my strong opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Gail Viamonte

I oppose the City's Mid City Communities Draft Plan as it applies to the Kensington Talmadge neighborhoods. Instead, I support the KTPG Alternative Plan, which: • Concentrates new housing density along transit corridors and commercial areas rather than deep within established residential neighborhoods. • Preserves existing residential zoning. Current ADU, SB 9, and other state and local programs already provide substantial opportunities for additional housing in these areas. • Requires that growth be paired with necessary infrastructure, including parks, libraries, and community facilities. • Identifies, protects, and appropriately recognizes potential historic districts and historic resources, including existing State and National Register districts. • Supports a community that serves residents at all life stages — first time homebuyers, families, and seniors. • Maintains safe and reliable evacuation routes in the event of fire or other emergencies. Please record my opposition to the City's Draft Plan and register my support for the KTPG Alternative Plan	Markus Weyde
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I live in Kensington-Talmadge and I oppose the City's Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe fire or other emergency evacuation routes. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Caitlyn Rother

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan. Please open your hearts and take the time to see all sides. Thank you for your consideration.	Jennifer Bourquin

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I understand the need for more affordable housing units in the City. In my neighborhood of Kensington there can be units in filled on Adams Ave but not on historic side streets. El Cajon Blvd and University Ave have lots of additional opportunities right on transit lines. Each community has to share in furthering density but please do it smartly Michael Eichler Sent from my iPhone	Michael Eichler

As noted in my earlier message today, attached are the seven documents that make up the San Diego Fair Housing Lab's public comment on the first draft Mid-City Communities Plan Update. Please include them in the public record. 1. Fair Housing Findings on the Mid-City Plan Update (the comment itself) 2. Mid-City Communities Fair Housing Review 3. Mid-City Corridors Supplemental Analysis 4. to 7. Appendices 1 to 4, the community reports for City Heights, Eastern Area, Kensington-Talmadge and Normal Heights The same documents are posted at https://www.sdfairhousinglab.org/mid-city. Please reply to confirm receipt.	Wesley Morgan

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Emile Bourquin

I wrote a longer piece that I posted on my Substack page, actually. I emailed the public comment page for a way to send it to you, but never heard back. So, I'm going to copy it here, and I hope you can add it to the others. I was at the Ken-Tal meeting the other night and asked you for a way to submit comments, but the website you gave me for public comment form limits answers to short responses. Thanks. Until I found a flyer on my doorstep about a community meeting last night, I was not aware that the city of San Diego was updating the 1998 community plan for my neighborhood of Kensington-Talmadge and several others that are nearby but have completely unrelated interests and socio-demographics. Because I covered City Hall for many years when I was still a working investigative reporter for The San Diego Union-Tribune, I took my notebook to the meeting. After we listened to two city planners present the highlights of the community plan update, Neil Winner, chairman of the Kensington-Talmadge Community Planning Group (KTCPG), summed up his group's very measured response like this: the plan update "is not compatible" with the historic nature or the infrastructure and fire safety needs of our community. He said the KTCPG submitted an alternative plan to the city, but was told that it did not comply, without any discussion or the ability to challenge or resolve that conclusion.	Caitlyn Rother

Here's my view: First, don't hold back. What the city is proposing is a nightmarish crush of increased density, to fill our cute, historic neighborhood of well-maintained single-family homes in South Kensington with garrish apartment complexes looming six to eight stories, and three to five times the number of people living in that space as they are today. The plan allowing these new complexes, which would all be squished into the few square blocks surrounding my house, is envisioned to triple the community's overall population and yet developers will not be required to provide any additional parking spaces because they will be built just blocks from a couple of bus routes, some of which are now slated for reduction or elimination. Just take a minute to process that ridiculous lapse of common sense and logic. What I heard last night is that we are so far into this process that there have already been 118 (or 180, there were a lot of numbers flying around) meetings during which the city planners have already listened to a lot of concerns already, and the public comment period ends in just ten days (on October 2) so we're almost out of time. To me, that means that the city has either done a poor job of educating and informing its residents or we have too few reporters to cover these issues. Both are probably true. I was told last night that the Union-Tribune did publish a story, but it only just came out, and even though I'm a digital subscriber, I never saw it until someone texted it to me last night. The KTCPG says it has been quietly working on this issue with the city for two years during which time members said many of their expressed concerns and the alternative plan they submitted have been blatantly ignored. That's the real plan update.	Caitlyn Rother

What we want is a plan that respects our “historic nature and our historic district,” one community group member said, noting that a proposed historic district designation for Kensington-Talmadge has already been submitted to the state. I downloaded a copy and it’s quite extensive. My question is, if this plan update passes, will that historic designation nullify it? Or vice versa? Does one supercede the other? One community fire-safety group leader raised the question last night whether we even have enough water or pressure to put out fires in this area as it is, noting that 76 homes burned in a fire in Normal Heights in 1985. The other one noted that the streets marked for growth are those that are already flagged as fire evacuation routes, so they would be even more clogged if a fire should break out—just as they were during the most recent wildfire, before any of these complexes had been built. To illustrate the possible consequences, the group put up slides from the Palisades fire of 2025, which burned down 6,738 structures across 37 square miles, and the Paradise fire of 2018, when most of the town, which was built in a forested area but had only one primary way out, went up in flames and left motorists trying to flee stranded. “In Kensington, we take wildfire seriously, because it’s a real risk,” one fire safety leader said, adding that we need to increase infrastructure and fire safety measures along with any planned population growth, and given that we are surrounded by canyons, a detailed wildfire evacuation analysis should be done before this plan is approved.	Caitlyn Rother

What I also heard and saw with my own eyes was that the two young city planners who put this “draft” plan together are feeling attacked and defensive by this whole process. I wouldn’t say they’ve gone numb to new ideas or criticisms, because one of them was diligently taking notes on a laptop, but they gave the indication that they are just doing their jobs, and have already done so much work on this “draft” that there isn’t really time or hope left to ask for substantive changes. And although we were all encouraged to “use our voice” to comment on this plan update, my sense of the room (and talking to neighbors afterward) was that we were left feeling like it won’t do much good, because of the planners repeated references to onerous state requirements and laws. So, here’s an idea: why don’t we repeal whatever state law eliminated the requirement for developers of these new high-density apartment complexes—and also the ADUs that are already clogging up my street with renters’ cars—to provide parking spaces? How about a ballot initiative? If that legislation is SB 79, which is the new state law that set these high-density goals within a half-mile of transit stops, then so be it. Why now? We heard that the schedule for this plan update was tied to a grant that will soon run out, and that the plan itself was driven by the existence of nearby bus routes on busy commercial streets such as El Cajon Boulevard, which, as I said, are already planned for reduction by MTS. Other cited instigators were the affordable housing crisis and the worsening of climate change and greenhouse gas emissions, which should make us all get rid of our cars and take the bus or our bicycle, so we wouldn’t really need those parking spaces.	Caitlyn Rother

But as was mentioned last night, many of the new apartment complexes that are already shooting up along freeways and busy thoroughfares are too expensive for low-income people who need affordable housing, so they are not actually solving anything. "We don't have a housing shortage, we have a shortage of affordable housing," one KTCPG member pointed out. And as one city planner noted, developers are learning the hard way that they can't rent apartment buildings that provide no parking. (That's because it's an incredibly dumb idea to build them that way in the first place.) I saw a lot of distraught people at the meeting last night, many of them older women who live alone in their homes, their faces fraught with panic, frustration, hopelessness, helplessness, and anger. I saw my own feelings displayed on their faces, as my neighbors and I were left feeling that we in South Kensington, where these density changes would occur, don't really matter. That our needs are not as important as the residents of the more expensive homes north of Adams Avenue, which will be unaffected by this plan update. And why is that? What I heard last night in response to residents' and community planning group members' concerns were a lot of excuses. The one that galled us the most was, (and I'm paraphrasing), yes, we are proposing six- to eight-story buildings in your neighborhood, but "the state doesn't require developers to provide parking and that trumps our previous city requirements, so there is nothing we can do about it." We also heard a lot of what sounded like, "we will consider considering that idea," whatever it was.	Caitlyn Rother

For the record, the three other areas covered by this plan are known as Mid-City, City Heights, Normal Heights, and Eastern Area. Somehow, during the last city council redistricting process, we were lumped in with these communities in what are now proving to be the horrifying and inequitable consequences of this mismatch. I covered redistricting as a reporter for the Union-Tribune more than twenty years ago, when we were grouped with areas that were more similar, and our council member was a better listener to constituent concerns. I say these other areas are unrelated, because from what I read in the newspaper, their residents believe they have been long neglected and left to deteriorate, so they welcome these new developments. So, why can't the density-affected area start at El Cajon Boulevard and head south, encompassing the communities that actually want new development? Of all four areas, Kensington-Talmadge is the only one that has a historic nature (and/or has a historic district application pending). We have a completely different make-up, and that is, we are comprised primarily of older single-family homes, with only a few small apartment complexes here and there. My house was built in 1936 and has Craftsman features such as built-in bookcases, arches and curved ceilings, and that's the reason I bought it. In fact, I sunk my savings into paying off the mortgage and to maintain it so that I could afford to live here, retire here, and die here. The last thing I wanted when I did that, was to be surrounded by six- or eight-story noisy and crowded apartment complexes that are not required to provide parking. As business owner Stella Stehly so aptly stated, "Where do you put all of these cars?"	Caitlyn Rother
This is NOT good for our city, our community. This development is looks dangerous for us all. No No No,	Sondi Cesena-Dove

I am submitting comments for the proposed Mid City Communities Draft Plan Update for the Kensington Talmadge community. I have read through the materials, attended some of the meetings and provided comments previously. I strongly oppose the plan as drafted. The KTPG alternative plan is much more aligned with the community's desires and still provides density along transit corridors while preserving neighborhood character and increasing density and walkability. Local and state laws already encourage and permit ADU's in our neighborhoods- allowing homeowners to build ADUs, increasing rental and/or for-sale units while maintaining neighborhood character. A plan such as this, as you know, doesn't put extra pressure on existing infrastructure (as the City's draft plan would). The value of these older neighborhoods to the fabric of the City of San Diego is significant. I have long advocated for improving the underutilized El Cajon Boulevard and University Avenue corridors and because both streets have established transit, they are equipped to accommodate increased density with mixed uses. The KTPG has developed a clear strategy that can accommodate the City's long term goals for the Mid City Communities. These are our community leaders, members of the community that have long histories and knowledge of the neighborhoods. Please modify the draft plan to incorporate the recommendations made by the KTPG. Their plan is a long term vision for appropriate growth while respecting the historic value of the neighborhoods. I support the KTPG Alternative Plan!	Karen Lynch
FIRE SAFETY INFRASTRUCTURE AND EVACUATION ROUTES Any mid city plan should give priority to addressing infrastructure issues such as sewer, water, and the availability of water (plus water pressure) should a fire in a residential area occur. Evacuation plans should be in place with accessible escape corridors for all residents BEFORE more high density building are erected.	Dixie Blake

SMALL BUSINESS PROTECTION Consideration should be given to those neighborhood businesses that will be replaced by large apartment and condo structures. Our communities support and rely on these small businesses. Moving them to a “business park” somewhere else is unacceptable.	Dixie Blake
HISTORIC DESIGNATION FOR KENSINGTON SHOULD BE PROTECTED Kensington is waiting for the final approval of our historic destination. However, the Mid City Plan shows that the Historic Designation for Talmadge, already in place, will not be honored, with a portion of it being turned over to high density housing anyway. Can we expect the Kensington historic designation to finally be granted or will it be dismissed or altered to fit this new plan for high density housing?	Dixie Blake
UNREALISTIC PROXIMITIY TO TRANSIT Designating areas as eligible for high density housing because they are within a mile of transit is unworkable. Many people, whether they are elderly or infirm, disabled, or traveling with children, do not have the ability to walk a mile to catch a bus. Better sidewalks or pedestrian crosswalks do not address this reality. Current plans by the Metropolitan Transit authority to cut by one third the number of bus routes and reduce frequency or service on another 29 bus routes is totally contradictory to the Mid City Plan to make people more reliant on the transit system.	Dixie Blake

ALDINE DRIVE – MAINTENANCE AND LOWER WEIGHT LIMITS AND TRAFFIC MITIGATION Aldine Drive is already too heavily trafficked and plans that are now being proposed or could be resurrected from plans in the past are unrealistic. This road should not be expanded or improved to encourage commuter traffic going from new high density areas to bypass the Freeways and continue down Adams Avenue or use Van Dyke as access to the freeway. Specifically the plan Mid City Communities Plan discourages regional commuter cut through traffic from using neighborhood streets to bypass freeway congestion. And going back even to discussions with Toni Atkins when she was running for City Council in the year 2000, weight limits were discussed for Aldine due to the wear and tear on the road and the constant need for repair – a priority which is not being met even today. The heavy buses and high volume traffic keep this road in constant need of maintence.	Dixie Blake
NEW BUILDINGS SHOULD HAVE SOME AMBIANCE New apartment and condo complexes are not aesthetically pleasing. Why is the city allowing these new structures to be completely devoid of any attractive appearance from the street. Some architectural detail should be incorporated into the plan for new structures for beautification of the neighborhood. Set backs and trees are not the same. The bjildings being being built now are just big boxes with no appeal. They look more like what you see on the outskirts of St. Petersburg Russia.	Dixie Blake

UTILIZATION OF TERRACE DRIVE MINI PARK Terrace Drive mini park – this is a much overlooked asset to the community. The problem seems to be that it is associated with a Caltrans right of way. This should be overcome. A bike path was built between this park and Route 15 so it should be possible to enhance this area for community use. As it sits now, it is a flat area with some trees on the perimeter, and is used as a doggie doo area. If mini parks are to "offer features such as picnic areas, play areas, exercise equipment, turf, gathering spaces, walkways and landscaping that supports both flexible and active recreation" , this mini park is perfectly situated for improvements. Since it is flat, not on a hill like the current Kensington Library park, it is more accessible for the older population and does not require crossing busy Adams Avenue for a large part of the Kensington population. Our library park already meets the playground needs of small children. Enhancing the Terrace Drive mini park for other purposes would be a tremendous asset to the community.	Dixie Blake

I oppose the City's Mid-City Communities draft plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative plan which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods - leaves existing residential zoning intact. -ADU's, SB9, and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany any growth, including parks, libraries, community facilities and fire stations. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensure a place for people at all life stages, including first time homebuyers, families and seniors. - maintain safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan and register my support for the KTPG Alternative Plan.	Sue Lee

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I am a Talmadge resident and I would like to provide some feedback on the mid city plan. I would like there to be more trail access to our canyons and a focus not just on increasing park space but also increasing access to the existing natural spaces in the area. I love El Cajon as a transit corridor. I want to encourage there to be more properties zoned for small businesses, specifically for local bars and restaurants. There are plenty of tire shops and storage locations, and frankly it feels like there should be less of them. What I really want more local restaurants, bars and shops. I believe increased housing density along El Cajon blvd will encourage the above to happen. However I would like to make sure new high density housing units include parking, such as the ones in Talmadge off 44th street. Finally I love the idea of covering the 15 to increase park area. Perhaps that covering could extend all the way to Adams ave to further increase the amount of park spaces while also cutting down on noise and pollution from the highway.	Mike Georgiadis

The City is requesting public comments on its Draft Mid-City Communities Plan through October 2. Unlike most Community Plan Updates that focus on one community, the Mid-City Communities Plan Update encompasses Kensington-Talmadge, Normal Heights, City Heights, and Eastern Area. Community Plan Updates determine zoning and density for the next 20 to 30 years. The City's Draft Plan proposes major density increases—including significant upzoning within established neighborhoods—without a clear economic development strategy, population justification, emergency evacuation plan, or commitments to the parks, libraries, community facilities, and other infrastructure needed to support that growth. We believe there is a better, smarter approach. Mid-City has miles of underutilized commercial and transit corridors—particularly along El Cajon Boulevard and University Avenue—where new housing and mixed-use development can revitalize our communities while putting growth where transit and services already exist. The elected Kensington-Talmadge Planning Group (KTPG) has developed its own alternative plan for our communities. You can review the KTPG's response letter and their alternative plan for the communities of Kensington and Talmadge HERE. What should change?	James Knipe

- Focus new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - Leave existing residential zoning intact. ADUs, SB 9, and other state and local programs already allow substantial additional housing in these areas. - Require infrastructure to accompany growth, including parks, libraries, and community facilities. - Respect Kensington and Talmadge’s historic resources and recognize existing State and National historic districts locally. The deadline is October 2. Submit your comments by email to: PlanMidCity@sandiego.gov by this Friday, 10/02/2026, before this plan moves forward. Be sure to include the name of the neighborhood you live in. You can write your own comment, or copy and paste the following statement into your email: I oppose the City's Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe fire or other emergency evacuation routes. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	James Knipe

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Hi Mid City Community Planners - I live in mid-city, specifically city heights and I'd like to submit the below comments: Environmental burden ranges more widely inside this plan boundary than any other measure in it. City Heights sits at the 74th percentile statewide on CalEnviroScreen, in the top quarter of California census tracts, while Normal Heights sits at 18.1 and the citywide figure is 37.1. New residential capacity is proposed along corridors running through the most burdened parts of this plan area. I am asking the City to test its land use pattern against that burden before the highest-density designations are finalized.	Zach Siegrist

In its August 2025 Ideas Report the City committed to assessing air and noise pollution alongside the additional density it was considering along El Cajon Boulevard, University Avenue and the SR-15 corridor. The density is in the first draft. The assessment is not. I am asking the City to complete and publish that assessment for the geography it named, and to do so before the highest-density designations are finalized rather than after.	Zach Siegrist
The ten designated corridors in this plan carry between 4,400 and 44,400 vehicles a day, a tenfold difference, and they receive a single corridor treatment. Twelve intersections in the plan area already operate at substandard levels during peak periods. I am asking the City to differentiate residential intensity by measured roadway volume rather than applying one designation across conditions that are not alike.	Zach Siegrist
The plan's own urban design framework describes concentrating the highest intensity at transit villages and stepping down to lower-scale buildings away from the corridors. The land use map instead runs the highest designation as a near-continuous ribbon along the full length of El Cajon Boulevard and University Avenue. Lining both sides of the busiest roadways with homes is the near-roadway exposure the City said it would assess. I am asking the City to implement the transition its own framework describes.	Zach Siegrist
I support building substantially more housing in Mid-City. I am asking the City to concentrate that height at the transit stops and step it down toward the existing homes, rather than spreading a uniform maximum along the roadway edge. That is the same amount of housing, sited where it does the least harm and the most good, and it is what the plan's own urban design framework describes.	Zach Siegrist

I, along with my neighbors, oppose the City's Draft Plan for the Kensington-Talmadge communities. Instead, I, and my neighbors, as our email comments state, support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe fire or other emergency evacuation routes. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Priscilla
The people living in the City Heights area should be legally protected from being displaced from their homes.	Kacey Blue
I oppose the Mid-city Communities draft plan and recommend instead the KTPG alternative plan. We are ruining neighborhoods Why? I am a Talmadge resident of 42 years.	Doris Corrado

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: • Focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. Many parts of the Mid-City area are ripe for redevelopment that could include substantial, well-designed housing projects that would be vastly superior to small, scattershot development on what are currently single-family home lots. • Leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. Those who want to add housing to their own currently single-family lots thus have the ability to do so under current law. • Requires infrastructure to accompany growth, including parks, libraries and community facilities. Housing alone does not make a community. A plan must be combined with funded amenities, including parks and other outdoor spaces. Not just an aspirational desire for them. • Recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. So many areas are ripe for re-development, including apparently frozen projects or those that have never gotten off the ground at all. There is no need to put historic structures at risk while empty lots and dilapidated buildings create eye sores for the community. • Ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. Again, well-planned, major projects are most likely to be effective. Not the haphazard development of small lots. • Maintains safe evacuation routes in the event of a fire or other emergency. Again, well-planned communities. Please record my opposition to the City's Draft Plan and register my support for the KTPG Alternative Plan.	Steve Semeraro

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. Our neighborhood is already overcrowded. Parking is a problem not only for residents but for local businesses, too. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Gigette Caldwell

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. Our neighborhood is already overcrowded. Parking is a problem not only for residents but for local businesses, too. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	John Caron

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. Our neighborhood is already overcrowded. Parking is a problem not only for residents but for local businesses, too. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Hal Mirksy

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. Our neighborhood is already overcrowded. Parking is a problem not only for residents but for local businesses, too. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Nikolaus M. Szeverenyi

Kensington is at Extreme risk for fires due to its numerous overgrown canyons. The potential for the kind of catastrophe we witnessed in Palisades is very real, precisely because of the extremely narrow roads, and limited options of egress for residents & ingress for emergency vehicles. Couple this with the large numbers of cars already clogging the roads and imagine what will happen with the density you are proposing, let alone the density currently allowed. We are at a critical point where density should be REDUCED, not INTENSIFIED in our neighborhoods and along Adams. Adams Ave is also very narrow east of 15 and will not be able to handle the level of density you are proposing for everyday traffic, let alone a mass evacuation. We need a safe evacuation plan now, before it's too late, and in any planning for the future. As a Kensington resident of 34 years, I urge you to realistically address these issues in your Mid-City plan -- instead of prioritizing the funding deadline and state goals over our real-time hard reality. I also formerly request that you work closely with the KenTal Planning Group to let their expertise of our neighborhoods help guide you to better solutions than your current first draft outlines.	Cecelia Conover

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. Our neighborhood is already overcrowded. Parking is a problem not only for residents but for local businesses, too. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Carol Caron

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. Our neighborhood is already overcrowded. Parking is a problem not only for residents but for local businesses, too. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Eric Peterson

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I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. To support my objection, I'd like to highlight two primary concerns among the others listed below. Our existing transportation infrastructure (roads, access to public transportation, etc.) is extremely physically constrained. Narrow roads, a singular entry/exit path through Adams Ave., and geographic constraints, including cliffs on 3 boundaries of our neighborhood, mean that additional concentration will cause exponential crowding impacts on the community. This jeopardizes emergency response and safety disproportionately. We saw the consequences of the already crowded/challenging infrastructure design during the Talmadge fire just 2 years ago. By moving forward with this plan, I think we are disregarding the horrific impacts and lessons learned from the recent Los Angeles fires. We need to prioritize development in the most impactful communities where conversion of dormant/underserved business zoning, higher density infrastructure support, and physical space can accommodate increases in population density, namely near the El Cajon Blvd. transit center.	George Bonebright
Further, existing utilities (water, power, etc.) are critically underdeveloped in our neighborhood as it stands. From firsthand experience, I receive nearly 30% lower power delivered to my home during even the slightest upticks in grid demand. Before considering any increases to housing density, we would first need meaningful and expensive upgrades to the existing infrastructure and services which will take significant time andinvestment to accomplish. With our existing infrastructure constraints, improvements are incredibly disruptive and costly as evidenced by the cliff support and drainage work that occurred on Canterbury over the past 3 years. The work required shutting down the entire road, staging equipment precariously and unsafely hanging off the cliff for extended periods, and delivering and storing materials directly in the middle of the Canterbury/Westminster intersection for the entire project's duration. A short review of that project's challenges would immediately highlight how disruptive and costly development in this neighborhood can be.	George Bonebright

As a lifelong resident of San Diego, my objection is truly founded on serving the entire community in the most practical and safest ways possible. I acknowledge that expansion is a difficult problem to solve, however, there are safer, more cost efficient, and faster ways to address our growth needs that I believe must be exhausted before engaging in complex, costly development in neighborhoods that physically cannot support it. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	George Bonebright

1. Affordability must be guaranteed, not assumed The draft's guiding principles include "More affordable homes in every neighborhood," and Chapter 2 sets a goal that "affordable homes are abundant and preserved." However, the plan increases residential capacity to as much as 218 dwelling units per acre along corridors and villages, and the draft itself acknowledges in its Anti-Displacement section that public investment can support market-rate development that increases displacement pressure on existing residents. The plan also states that it identifies capacity but does not mandate that any particular homes be built or be affordable. Given this, I respectfully request that the Second Draft: - Strengthen Policy 2.15 (on-site very-low and low-income affordable housing rather than in-lieu fees) so that it is a clearer expectation, not only something the City will "support... to the maximum extent feasible." - Move forward with the evaluation described in Policies 2.16 and 2.17, and set a timeline for how Mid-City's displacement risk will inform the Inclusionary Housing Ordinance. - Tie the highest-density land use designations to deeper affordability, so that the added capacity benefits residents who need housing most. - Prioritize publicly owned sites for affordable housing (Housing Element Policy HE-A.6), and fund the community land trust and acquisition programs in Policy 2.12. - Add measurable affordability targets and annual public reporting, so the community can see whether the plan is delivering homes at the income levels it promises.	Riley Hunsaker

2. Parking and neighborhood impacts need to be addressed in the plan With capacity for roughly 30,000 additional homes, I am concerned about the spillover effect on residential streets where new multi-story buildings do not provide enough parking for their residents. Normal Heights already has limited on-street parking along and near Adams Avenue and El Cajon Boulevard. The Mobility chapter (Chapter 6) focuses on walking, biking and transit, which I support, but residents will still own and need to park vehicles, particularly while transit improvements such as the planned light rail and bus rapid transit remain years away. I respectfully request that the Second Draft and its environmental document: - Include a parking demand and spillover analysis for Normal Heights and the other corridor-adjacent neighborhoods. - Add policies for parking and curb management, such as residential permit parking districts, shared parking, and loading zone planning, to protect residential streets. - Phase or coordinate increased density with the delivery of the transit and mobility improvements the plan relies upon. - Encourage on-site parking in new developments where transit service is not yet in place.	Riley Hunsaker

3. Parks, small businesses and community amenities should be delivered alongside housing The guiding principles include "Parks in every neighborhood" and "Innovative business districts support community life," and the plan includes supportive policies, including 2.2 and 2.20 on neighborhood-serving retail and small business growth, 2.10 on protecting small and local businesses, LU-H.4 on balanced commercial development, and LU-H.10 on accessible parks. The City's FAQ explains that much of the new public space is expected to come from plazas, setbacks and other features provided as individual development sites come forward. That approach depends on private development timing and may not deliver meaningful parkland in Normal Heights, which is already short on parks. I respectfully request that the Second Draft: - Identify specific, funded park and plaza sites in Normal Heights, and commit Development Impact Fee revenue to parks in the neighborhoods where growth occurs.	Riley Hunsaker
- Require active ground-floor commercial space along Adams Avenue and other corridors, including affordable commercial space for local entrepreneurs, consistent with Policy 2.20 and the Adams Avenue Study Area in Chapter 5. - Include anti-displacement protections for existing small businesses, not only for residential tenants. In summary, I support a plan that adds homes, but those homes should include meaningful affordability, be supported by parking and transit planning, and be paired with the parks and small businesses that make Normal Heights a community. I ask that these comments be included in the public record and considered in preparing the Second Draft. Please also add me to the email list for future updates on the plan.D126	Riley Hunsaker

First I'll broadly state that I fully support traffic calming, pedestrian safety, bicycle access, sharing the roads and streets, and taking some of the space back from cars. Eliminating parking, eliminating lanes for cars and repurposing them for people. Hell, I even support closing some streets entirely to cars. Also more transit! And more housing! Regardless, after perusing the plan, I'm concerned that it suffers from a cart-before-the-horse problem and that it encourages density along some routes with only one inadequate bus line. Furthermore, even though some of those corridors have proposed rapid bus service, even those will do little to deal with additional vehicles on the road. Asking people to walk half a mile to a bus stop is a significant deterrent when all buses stopping there effectively start and end at the same locations. Full stop. It's misguided to think that we should build density and then think about the consequences. We should lead with infrastructure. Lead with the transit, lead with the pedestrian access and safety, lead with the bike lanes. Or at worst do it simultaneously. Building density and then maybe supporting it later is backwards planning.	Dan Driefort
I'll also note that while I fully support charging for parking, and I wish that we did it in more places, it also creates a cart-before-the-horse unintended consequence. When parking was free, more parked cars effectively narrowed the road and provided a degree of unintentional traffic calming. With fewer cars using paid parking, more road space is opened up, and cars are increasingly doing dangerous, illegal things, including passing at high speeds in places where they weren't able to before. It's horrible, it's unsafe. When we start charging for parking, we should also be installing traffic calming simultaneously along the corridors. Also, I like trees and parks 🩶 Thank you for trying to make our little corner of the world better and more people-centric.	Dan Driefort

We are residents of the Kensington neighborhood and wish to express our strong support for the alternative plan for the Kensington-Talmadge communities submitted by the Kensington-Talmadge Planning Group. This alternative plan addresses serious problems with the Mid-City Communities Plan Update for our community. As 27 year residents of Kensington, Iwe are familiar to the historic nature of our community and the significant/severe problems that would be introduced by the Mid-City Communities Plan Update.	Terrence Frey & Beverly Barrett
• Although our community is served by the No. 11 bus along Adams Avenue, this could not be considered a transit corridor as the bus route exits Adams Avenue at it's East end just before Adams Avenue ends in the Talmadge Park community of Kensington and heads down the narrow winding two lane Aldine Dr. to south on Fairmont Avenue before heading north on Montezuma Avenue. While commuting to SDSU I used this bus frequently and while it was convenient for me I don't think it could be accurately described as a transit corridor.	Terrence Frey & Beverly Barrett
• Kensington is in a severe fire zone with many houses (including ours) located on canyons that are serious fire hazards forming paths for wildfires up into our neighborhoods. Our neighborhood has a single relatively narrow ingress and exit street, Alder Drive, that significantly increased density between Adams Avenue and Alder Drive as proposed in the Mid-City Communities Plan would very seriously exacerbate.	Terrence Frey & Beverly Barrett
• Our neighborhood is a very historically significant one, and the increased housing density could seriously denigrate it's beauty and significance. The Kensington-Talmadge Planning Group has submitted an alternative plan that meets the needs of the city for increased housing development without the significant negative impacts outlined above, and I encourage you to seriously consider these changes.	Terrence Frey & Beverly Barrett

I write in opposition to the City of San Diego's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. I do, however, strongly support the alternative plan developed by the Kensington-Talmadge Planning Group. The KTPG Alternative Plan offers a number of reasonable alternatives for addressing the same needs while still protecting the integrity of the existing neighborhoods. • Specifically, the plan prioritizes new density on and near transit and commercial corridors, rather than deep within established neighborhoods. • It leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. • The alternate plan also requires adequate infrastructure to accompany growth, including parks, libraries and community facilities. • It recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. • It ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. • Finally, it maintains safe evacuation routes in the event of a fire or other emergency. I request that you please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Gina Gianzero

Here is another op-ed I wrote this week, published in the Times of San Diego: “Opinion: The Hidden Cost of Upzoning Is Living With Constant Uncertainty” Read the article in the Times of San Diego <https://timesofsandiego.com/opinion/2026/09/28/hidden-cost-upzoning-constant-uncertainty/> I believe this article is particularly pertinent to the questions of where, how, and why increased density is being proposed within established single-family neighborhoods. It addresses an important consequence of upzoning that is often overlooked: the long-term uncertainty created for existing residents when the development expectations for their neighborhoods are fundamentally changed. I hope you will consider these concerns as part of the Mid-City Communities Plan Update.	Laura Henson
I wanted to share the comments I submitted to City Planning on the Draft Mid-City Communities Plan, specifically from my perspective as a Normal Heights resident. My hope is that as Normal Heights evolves, that we all work together to make the neighborhood more welcoming for both current and future residents. At a high level, I’m supportive of growth and additional housing, but I’d love to see that growth paired with a strong focus on resident stability, more trees and public spaces, and protecting walkability as well as Adams Avenue as the social heart of the neighborhood.	Madeleine Baudoin - WORKING GROUP MEMBER

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - Focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - Leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - Requires infrastructure to accompany growth, including parks, libraries, and community facilities. - Recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - Ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - Maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Pamela Wilson
I support the central idea that our neighborhood in Normal Heights should evolve. We need safer streets, more trees, more public spaces and more opportunities for people to live close to schools and the places they work, shop, and gather. But I believe the measure of this plan should be larger than how many additional housing units it makes possible. My highest priorities are to make Normal Heights dramatically more walkable and shaded while ensuring that the people who already live here can stay and enjoy those improvements. As the City considers the future of Normal Heights, I ask the City to carry four priorities into the next draft:	Paul Coogan

1. Make resident stability a measure of success. Growth and density in Normal Heights should create room for new neighbors without unnecessarily displacing the people who already live in Normal Heights. A healthy community plan should be capable of making room for both existing residents and future residents, so they all belong without the fear of displacement. As new housing is added, the city should also have a clear strategy for preserving existing housing and be monitoring displacement, renter stability, and a plan for housing preservation.	Paul Coogan
2. Treat Adams Avenue as the social heart of Normal Heights. Adams Avenue works because people hang out and encounter one another there. It is the backbone of our community. The place where people go to the grocery store, restaurants, yoga studios, the post office, cafes and hair salons. Most of the businesses along Adams Avenue are locally owned businesses and create repeated opportunities for people to see one another, do business, and develop relationships. Theseseemingly ordinary encounters are part of the infrastructure of a thriving community like Normal Heights. As Adams Avenue grows, new development should strengthen the quality of life that already exists through active ground floors, smaller storefronts, inviting sidewalks, pocket parks, outdoor seating, trees and places where people can sit, hang out and be together. More housing and density along Adams Avenue should result in more neighborhood life, and connection.	Paul Coogan
3. Connect growth to visible improvements in everyday life. Growth is easier for a community to embrace when people can see and experience how it contributes to a better neighborhood. More density should bring more trees, more public spaces, and traffic calming measures along Adams Avenue and surrounding areas. Is there a way we can communicate this better in the plan? I also support the addition of a modern library in our neighborhood that the residents and schools can use.	Paul Coogan
4. Make walkability and shade essential infrastructure. Normal Heights is already a walkable and densely populated community. As it grows, walking should become safer, easier and more pleasant. That means traffic calming, wider sidewalks, and comfortable connections among homes, Adams Avenue, schools, parks and community facilities. It also means taking shade seriously. Shade affects whether someone chooses to walk to the store, wait for a bus, walk a child to school or spend time outside.	Paul Coogan

The City should establish measurable tree-canopy and shade goals, with the long-term aspiration of making Adams Avenue a nearly continuous shaded pedestrian corridor. I think thirty years from now, the measure of this plan should be whether people of different incomes can still live in Normal Heights, participate in neighborhood life, encounter one another, feel that they belong, and whether the things that make Normal Heights such a wonderful community, continue to grow stronger, healthier, and better with the change. If we can accomplish that, we will help create the conditions in which the community of Normal Heights can continue to flourish.	Paul Coogan
I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - Focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - Leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - Requires infrastructure to accompany growth, including parks, libraries, and community facilities. - Recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - Ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - Maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	L Heller

I’m writing regarding the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities, which I strongly oppose as poorly thought out and completely wrong for the unique Kensington area. Instead, I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - requires infrastructure to accompany growth, including parks, libraries and community facilities. - recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Elizabeth Guepin

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - Focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - Leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - Requires infrastructure to accompany growth, including parks, libraries, and community facilities. - Recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - Ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - Maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Robert Connelly

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - Focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - Leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - Requires infrastructure to accompany growth, including parks, libraries, and community facilities. - Recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - Ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - Maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Brad Cameron

I am writing to express my opposition to the City's Mid City Communities Draft Plan for the Kensington / Talmadge neighborhoods. I instead support the Kensington-Talmadge Planning Group (KTPG) Alternative Plan, which: • concentrates new density along transit corridors and commercial areas rather than within established residential neighborhoods • preserves existing residential zoning, recognizing that ADUs, SB 9, and other state and local programs already provide meaningful opportunities for additional housing • requires infrastructure to grow alongside housing, including parks, libraries, and community facilities • acknowledges and protects potential historic districts and historic resources, and formally recognizes existing State and National historic districts • supports a community that serves residents at all life stages—first time homebuyers, families, and seniors • maintains safe and reliable evacuation routes in the event of fire or other emergencies Please record my opposition to the City's Draft Plan and my support for the KTPG Alternative Plan.	Debbi Bourke

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - Focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - Leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - Requires infrastructure to accompany growth, including parks, libraries, and community facilities. - Recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - Ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - Maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Jeff Goldstein

I oppose the City's Mid-City Communities Draft Plan for the Kensington-Talmadge communities. Instead, I support the KTPG Alternative Plan, which: - Focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - Leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. - Requires infrastructure to accompany growth, including parks, libraries, and community facilities. - Recognizes and protects potential historic districts and historic resources, and recognizes existing State and National historic districts locally. - Ensures a place for people at all life stages, including first-time homebuyers, families, and seniors. - Maintains safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Linda Briggs

As currently drafted, I oppose the City's Mid-City Communities Draft Plan. I have read the plan and support several of its "intentions" for needed housing, transit, parks and recreation spaces, walkability, environmental issues (e.g., fire) and more, but am concerned there is no solid plan for anything except the upzoning. Fire: I didn't see a solid plan for addressing fire danger mitigation and evacuation. This is already a significant concern in certain plan areas designated Very High Fire Hazard Zones, Fig. 4.1. Under the proposed plan, we will need to protect and potentially evacuate a much higher population with little change to street capacity and transit resources. I read the discussion of current fire resources. Unfortunately, there was only one potential additional station noted. Parks, Libraries, and Recreation: According to Table X.X, the existing recreation and park spaces fall short of the Parks and Master Plan Standard. I saw very few specific plans for increasing this to accommodate a doubling of the community population. A few new spaces were labeled "potential." We will also be losing "pockets" of green space when vegetation is removed to conform to Zone 0 requirements. We are planning to double the population in the same footprint of space. People need recreation, libraries, and green spaces to gather, learn, decompress, exercise, and enjoy. We also need green spaces to lessen the Urban Heat Island Effect that occurs in dense urban areas. I support ideas put forth in the Kensington-Talmadge Planning Group (KTPG) Alternative Plan. - focus new density outside of the Very High Fire Severity Hazard Zones and on/near transit and commercial corridors. Include solid plans for community resources, libraries, parks, gathering spaces or we will introduce more problems to the community than we solve. - plan and provide for community safety resources including safe evacuation routes in the event of a fire or other emergency. Please record my opposition to the City's Draft Plan, and register my support for the KTPG Alternative Plan.	Tracy Heath

Enhanced Infrastructure Financing District (EIFD) to help fund the SR-15 freeway caps The current draft Mid-City Community Plan includes an expanded freeway cap park over SR-15. SR-15 continues to have a significant impact on the quality of life of residents in Mid-City. We recommend that the Community Plan include an EIFD to fund the expanded freeway cap park with 80% of funds directed to the freeway cap. 10% of the EIFD should be dedicated to transportation. 10% of the EIFD should be dedicated to affordable housing.	Build SD
New hubs for Mid-City We recommend the creation of a few new transit and bike oriented hubs in the Mid-City plan update area: specifically at 35th Street, Winona Avenue, and in Oak Park. Zoning was changed to reflect the planned transit serving the areas. Existing stops on Rapid 215 at 35th and Winona are already well used, and connect to many jobs, schools, and amenities. This access should be expanded by zoning for more housing near transit, as well as mixed use zoning for the neighborhood. 35th is a good candidate due to hosting multiple parks and schools, as well as the 35th Street bike lane. It will also receive a stop on Rapid 10.	Build SD
Improve existing main streets In order to ensure the most pleasant neighborhood experiences, certain main streets saw their densities increase in accordance with scale and amenities. Adams Ave sees a modest density increase at its hub with 35th Street. El Cajon Blvd sees density increases at key intersections with major cross streets, as does University Ave. Mid-City has historically very important East-West thoroughfares, which is why special attention was also paid to the North-South streets. The 43rd/Fairmount Ave area, host to the highest ridership bus route in the MTS network as well as a future Purple Line station see some increases in density to maximize corridor coverage. Euclid Ave gets a bit denser by transit stations, while the 54th Street and College Ave corridors both heavily densify around a couple key major transit stations. In the southern area of the plan, future high quality rapid transit and a potential Purple Line station allow for more density along Federal Boulevard. Some lower density arterials such as Poplar Street and Home Avenue saw no major changes due to a number of factors.	Build SD

Make Mid City zoning more similar to its peers We recommend the Mid-City Community Plan update reflect zoning changes more similar to the Hillcrest Community Plan Update (2024) and the College Area Community Plan update (2025). While many transit stops such as El Cajon and Fairmont did receive equivalent zoning to these plans. Many other high quality transit hubs did not. One example being Euclid and Federal. Euclid and Federal is the site identified in the most recent SANDAG Purple Line Study as a potential station for the area. Additionally Rapid 625 which is in Advanced Planning would have a station at this site as well. This same logic applies in locations such as 54th and University and areas nearby the two Transit Plazas on the SR-15 Busway.	Build SD
Conform with SB 79 zoning The Mid-City plan update area includes 3 qualifying SB 79 transit stops according to SANDAG, and overlapping areas from 2 neighboring transit stops in North Park. The city planning department has fulfilled SB 79 requirements in the plan area except in the city's Very High Fire Severity Zone area. City staff had promised that areas that fall under SB 79 would be included in plan updates, and that should include the proper implementation of these areas congruent with their proposed plans for what properties would be excluded from SB79. The rule the City of San Diego made is if a lot is only accessible via a single access point and falls within a Very High Fire Severity Zone, then it is exempted from SB79. This means that even if a property were to fall under a Very High Fire Severity Zone, it would only be exempt if it is on a cul-de-sac. Therefore, we believe the city should do SB 79 equivalent zoning in two areas. We have zoned these areas aside from the cul-de-sacs to be in line with SB 79. Added below are the two areas we have upzoned to align with SB 79. [Aerial shows two cul-de-sac neighborhoods immediately east and west of Fairmount Avenue, north of Monroe Av]	Build SD

Transit recommendations based off proposed land use In the Mid-City plan area, a network of multiple planned Rapid routes and the proposed Purple Line form a robust network of high quality transit in the plan area. In order to support these plans and to responsibly factor transit planning into street design, a comprehensive bus lane plan is necessary. In the Mid-City plan area currently two Rapid bus routes exist, those being the 215 Rapid and 235 Rapid. These Rapid routes serve El Cajon Blvd and the SR-15 Busway respectively, and allow for improved transit mobility to many employment hubs such as Downtown, Kearny Mesa, and SDSU, as well as mobility within the Mid-City area.	Build SD
MTS Route 13 Improvements Route 13 is currently the highest ridership bus route in San Diego, however on many segments it is stuck in traffic. There are two potential ways to solve this: create a peak direction only bus lane on the Fairmount Ave Expressway, and a bus lane couplet on 43rd and Fairmount between El Cajon Blvd and Thorn Street. These 2 improvements alone would make Route 13 more reliable and faster.	Build SD
MTS Route 955 Improvements Route 955 is in the top ridership MTS routes, it could be improved by adding side running bus lanes on 54th Street between El Cajon Blvd and University Ave, where it would meet the Rapid 625 which also runs on 54th Street.	Build SD
Rapid 625 Rapid 625 is currently in advanced planning, serving the Mid-City area with stops at El Cajon Blvd & College, University & College, University & 58th, University & 54th, 54th & College Grove and Euclid & Federal. It serves many of the Mid-City communities with rapid transit. It would be in bus lanes along its whole length, with side running lanes on College and 54th, and center running on University. There would also be a dedicated guideway from the Euclid & 54th intersection to the Euclid & Federal stop. These stops would serve various communities in the Mid-City area, providing North-South rapid transit. It is planned to be completed by 2035 in the SANDAG Regional Plan.	Build SD

Rapid 688 Rapid 688 is currently in planning and would run from San Ysidro to University City via the existing SR-15 busway, serving the City Heights and Boulevard Transit plazas. To accomplish this, new ramps would be created to connect the HOV lanes on the 805 with the SR-15 Busway. Additional bus lanes are planned further north to speed up more transit trips. This project would become possible once the transit only ramps are completed in 2031 by Caltrans. Funding for this project has already been allocated.	Build SD
Rapid 10 Rapid 10 is a conversion of the existing route 10 into a Rapid. Currently running between Old Town and University & College, it would be extended on either end to Ocean Beach and La Mesa. To do so, new transit only lanes, transit signal priority, and the elimination of select stops would be required. This is to ensure a sub 1 hour reliable runtime between Old Town and La Mesa, allowing for necessary driver breaks. To accomplish this runtime, we are proposing new bus lanes on University from Euclid to 54th, then share the bus lanes with Rapid 625, and continue from College Avenue to the border with La Mesa. Side running bus lanes between Fairmount and the City Heights Transit Plaza. We believe peak direction bus lanes may also be necessary on University Avenue in segments between the City Heights Transit Plaza and North Park. Bus lanes already exist on University Avenue in North Park and more are planned as part of the Midway Rising Development. Rapid 10 is planned to be completed by 2035 in the SANDAG Regional Plan.	Build SD
Rapid 256 Rapid 256 is a planned Rapid that would run between SDSU and Cuyamaca College via Mid-City, Lemon Grove, and Spring Valley. It would run along College Avenue in the plan area, with stops at College & El Cajon, College & University, and likely stops at College & Streamview, and College & College Grove. The Rapid 256 would share bus lanes with Rapid 625 from SDSU to University Ave, a bus only lane from University to College Grove or to the plan area boundary may be required for this project. Rapid 256 is planned to be completed by 2035 in the SANDAG Regional Plan.	Build SD

Rapid 295 Rapid 295 is a planned Rapid between Spring Valley and Clairemont via La Mesa and SDSU. It would run on El Cajon Blvd in the plan area. The Mid-City plan is proposing Bus-Bike lanes on this section of El Cajon Blvd. Future study should determine whether a centerline busway would be better here instead. Rapid 295 is planned to be completed by 2035 in the SANDAG Regional Plan.	Build SD
Specific Bus Lanes With all of these planned high quality bus routes, they require commitments to bus lanes so they can run quickly and reliably. To ensure this, we ask for bus lanes along the entirety of El Cajon Boulevard. This is currently planned or already built as side running bus-bike lanes along many portions of the corridor, but a study to assess the efficacy of a center running bus lanes in the future could allow better speed and reliability. Bus lanes are also vital on most segments of University Avenue from the 805 to the border with La Mesa. Potential bus lanes along the segment would be a single lane from the 805 to the City Heights Transit Plaza, in rush direction only, and then from the Transit Plaza to Fairmount in both directions. This would be side running. Bus lanes would continue from Euclid to the border with La Mesa. Since the segment between 54th and College Blvd is already planned to have center running bus lanes, the entire segment here should. Along the Fairmount Expressway, bus lanes in rush direction only from Montazuma to Meade, and a couplet of bus lanes on 43rd Street and Fairmount from El Cajon Blvd to Thorn Street. Bus lanes on 54th Street would run from El Cajon Blvd, through onto Euclid, and to the 94. At the intersection of 54th and Euclid there would be a special segment using a transit guideway. College Ave bus lanes would run from El Cajon Blvd to College Grove Drive and potentially the border with Lemon Grove, and they would be side running.	Build SD

This email is to register my opposition, as a Kensington resident for 39 years, to the draft Mid-City Community Pan Update as proposed, for the following reasons: •The plan should separate the four distinct community planning areas which comprise Mid-City (as done in the 1998 plan update) in order to present a clear picture of where the opportunities and deficiencies exist and proposed growth will occur, and thereby identify specific objectives to achieve the plan's goals, particularly regarding park and recreation and other community facities; •The proposed upzoning along major transportation corridors does not designate adequate transition zoning at the single family residential interface. I support the proposed alternative SB79 Transit-Oriented Development zoning map developed by the Kensington-Talmadge Community Planning Group (KTPG) and strongly urge City Planning staff to incorporate it into the proposed plan update. It achieves the overall objectives of the State's SB79 while reducing the negative impacts to the existing residential neighborhoods by creating better transitioning between the various zoning types, and preserving historic districts and potential historic resources. •The plan does not require adequate infrastructure to accommodate projected population growth, specifically parks, and other community-serving facilities; •The plan does not recognize and protect potential historic districts and historic resources, nor recognize existing State and National historic districts locally; •The plan does not maintain or improve safe fire or other emergency evacuation routes to accommodate the projected population growth; •The plan does not recognize or describe the various existing City or State incentive density programs (e.g., Complete Communities, Density Bonus Program, etc.) that allow for increased population densities and floor area ratios overlayed onto the proposed upzoned properties; •The plan proposes to displace valuable parking area on Terrace Drive to provide minimal additional park	Deborah Sharpe
Yes to denser neighborhoods with lots of trees/shade, safe routes for bikes and pedestrians, and frequent bus times!	Crystal Pham

I'm writing to urge the CPU working group to make transit priority a network commitment, as Mid-City has been historically underserved by transit despite having the highest population density of any neighborhood in San Diego. MTS Route 215 is San Diego's highest-ridership bus line and the closest thing we have to true rapid transit, and critical actions must be taken to improve it. The current draft recognizes that transit reliability is affected by congestion on El Cajon Boulevard, University Avenue, Euclid Avenue, and Fairmount Avenue. It supports transit priority measures and identifies opportunities for transit lanes, peak-period transit lanes, shared bus-bike lanes, and a potential center-running bus lane on El Cajon Boulevard. Unfortunately, many of these recommendations are framed around studying, supporting, or coordinating future improvements. The final Community Plan should implement the Mobility Master Plan's direction to provide transit priority in roadway corridors and at intersections. For example, the Rapid 215 is the transit lifeline for Mid-City, linking its residents with jobs, schools, healthcare providers, and economic opportunities. Despite initial promises, the rapid route takes closer to 50 minutes rather than the advertised 30 minutes, due to key features that are incomplete or inconsistently implemented. Committing to prioritizing improvements, such as extending the continuous, red-painted bus-only lanes from Mid-City to SDSU and upgrading the transit signal priority system, are relatively low-cost, high-impact investments that would dramatically improve travel times and reliability for tens of thousands of daily riders.	Jahmere Gill
We urge you to establish El Cajon Boulevard and University Avenue as priority transit corridors, with specific commitments to transit signal priority, queue jumps, dedicated or peak-period transit lanes, and other measures necessary to improve travel times and reliability. These are practical, proven upgrades that would immediately improve reliability and speed while advancing San Diego's climate goals, equity commitments, and Vision Zero priorities. A fully realized Mid-City Master Plan that fully fleshes out the what, where, and with what funds of critical infrastructure, transit, and housing, is extremely crucial to the vitality of the area and the prosperity of its residents for decades to come.	Jahmere Gill

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We urge you to establish El Cajon Boulevard and University Avenue as priority transit corridors, with specific commitments to transit signal priority, queue jumps, dedicated or peak-period transit lanes, and other measures necessary to improve travel times and reliability. These are practical, proven upgrades that would immediately improve reliability and speed while advancing San Diego's climate goals, equity commitments, and Vision Zero priorities. A fully realized Mid-City Master Plan that fully fleshes out the what, where, and with what funds of critical infrastructure, transit, and housing, is extremely crucial to the vitality of the area and the prosperity of its residents for decades to come.	Zain Sharifi

As a long-time resident of the Ridgeview neighborhood of City Heights and prospective first-time homebuyer looking to invest in the Mid-City planning area, I am submitting feedback to be considered for the Second Draft of the Mid-City Communities Plan Update. The current Draft Plan prioritizes the area-of-focus to "Create Homes for All of Us" and "Champion Sustainability." To truly fulfill these pillars for low- and moderate-income residents trying to enter the housing market, the plan could expand flexible, alternative housing types on urban infill lots. Specifically, I request that the Second Draft Mid-City Communities Plan and its upcoming Implementation Regulations incorporate policy recommendations for the following: 1. Standalone small prefab/modular dwellings.Current city regulations restrict THOWs and prefabs under 400 sq ft strictly to Accessory Dwelling Units (ADUs) on lots that already contain a primary single-family home. I urge the City to allow these ultra-affordable, low-impact prefab structures to serve as primary, standalone residences on vacant or underutilized residential infill lots within Mid-City corridors. 2. Flexible energy infrastructure (off-grid/microgrid support). To fast-track the City's Climate Action Plan goals without overwhelming the local electrical grid, the update should explicitly recognize and permit the integration of mobile, unmounted solar appliances (such as mobile solar carports and localized battery banks) for primary residential use. The plan should protect a property owner's right to utilize mobile clean energy generation to achieve zero-net-energy status without facing the permitting delays and soft costs associated with traditional rooftop solar infrastructure. Expanding the land-use framework to include standalone tiny homes and flexible, mobile solar arrays will unlock affordable homeownership pathways for individuals like myself who are otherwise priced out of traditional real estate in City Heights and surrounding neighborhoods. Thank you for your dedication to building a sustainable, equitable, and resilient Mid-City over the next 30 years.	Georgina To'a Salazar

PUBLIC COMMENT FORM SUBMITTAL

Comment	Commenter
I'd love to see an increase in housing options for middle class. We are priced out. Especially in normal heights I'd love to see an increase in development and a "step" development. High density around main streets and transit then medium density ring then lower townhouse style in the outer area.	Adam Gottsch
There are no neighborhoods in the Mid-City plan that we should be wholesale considering historic. I can accept individual homes or businesses as being historic, but this community has nothing of any special historic character unique to San Diego or the country that 'tis worth preserving over the needs of current and future generations. Historic preservation should be for genuine historical interest.	Kyle Walker
There are too many areas near major corridors that remain zones with extremely low density. Especially in Kensington and Normal Heights.Kensington lost its movie theater because the community, during the last plan update downzoned and reduced economic development. With the advent of big screen TVs and Netflix, theaters can't compete unless the residential density is high enough to support them. Kensington is not dense enough to support a theater anymore and the community is worse because of it. Additionally, when you get deep into neighborhoods, they're in a business desert. It forces people to drive. The entire intersection at Marlborough and Hilldale should e designated mixed use to allow for corner stores and coffee shops. Same with the intersection at Copley and Harley in Normal Heights. I also think that once you get into densities above 35 du/ac that commercial should be prohibited. Everything that is 35 ac/du and above should also be zoned mixed use. Not required, but permitted.	Kyle Walker

I support fully implementing a robust cycling path network that enables residents to travel within and through out community without a car, without worrying about being hit by a car, and in a way that allows convenient access to our major residential and urban hubs. The most cycling paths we have, the more people will ride. Bike lanes should be on roads parallel to major vehicle thoroughfares, and if that isn't possible, should be grade separated and the parking lane to the left of the bike lane so that cyclists aren't intersecting with cars or parked car doors. If we want to minimize the impact of state laws that allow for less parking in new construction, then we need to embrace transit and cycling and walking for new and existing residents as viable options. Let people leave their car at home. I also don't think that the Adams Avenue density increase goes far enough. Especially in Kensington. There are areas that already have apartments and aren't currently not zones for it. So this plan does make up for the past 25 years limiting additional new density, but doesn't expand it. Especially on main areas like Marlborough that function as thoroughfares and could be slowed down significantly to make it safer by adding density and allowing small shops to bring out more pedestrian activity	Kyle Walker
There are too many stroads. Roads move people through a place and streets move people to a place. Almost all of the areas that are designated as arterials and collectors have destinations along them which causes conflicts with pedestrians, cyclists, and other drivers. These roads need to minimize the number of side streets, front doors, and driveways facing them. If you're not committing to low vehicle usage, at least try to designate areas along the edges of these major commercial areas to allow for parking garages so that street parking can be eliminated which will discourage people from driving into these busy areas and instead park at the edge and walk the 2 blocks in. North Park almost did this correctly. If the Parking Garage had been at University Ave and 31st, the neighborhood parking situation would be much better than it is today.	Kyle Walker
"Comments on Mid City Draft Plan Thank you for the opportunity to comment on the Mid-City Community Plan Draft. I appreciate the hard work and difficult process involved. I have some comments that I hope you will take into consideration. 1.Parks and Trails. Perhaps I missed it, but I did not see a map showing new and expanded parks and trails. We have one tiny park in Kensington which is heavily used by families. When the population along the Adams Avenue corridor is doubled, where will these families go for parks? There should be dedicated usable recreation-oriented parks in every block proposed for increased development.	Susan Hector

2. Ongoing Stakeholder Involvement. As a community of citizens, residents are stakeholders and should have continuous involvement in decisions made about our neighborhoods. Is there an organizational structure for this involvement on an ongoing basis? I am not talking about the planning groups but about actual residents. This involvement would address issues like pollution, littering, crowd control during events (including street closures), permits, etc.	Susan Hector
3. Infrastructure. Is funding available to upgrade water, sewer, electrical, gas, cable, roads, street furniture, sidewalks, and other infrastructure? Not one building should be constructed without dedicated funds to support the people who will live/work in the building.	Susan Hector
4. Mass and Height. Looming, massive buildings cause sun shadows, gloom, and poor air circulation. If building intensity is increased far beyond key corridors, these neighborhoods will become airless, dark, dank slums. Was sunlight and air circulation considered?	Susan Hector
5. Historic Preservation. I applaud the commitment to tribal (California Native American) involvement, but did not see a similar commitment for neighborhood and community involvement. Historic objects, artifacts, structures, and buildings have significance for communities; they may even be considered sacred. For example, Kensington village is cherished by the community. How will the village be impacted by this proposed massive increase in development, in terms of intangible qualities like community character and sacred spaces? Has an analysis been done of the significance of sacred spaces to the existing communities?	Susan Hector
It is unclear how the proposed bus routes improve the connection from Normal Heights to Mission Valley, in particular to the Grantville Trolley stop. Please clarify.	Marianne Greene
The statement that there is a joint use agreement for NH Elementary is misleading because the school has refused for years to honor the agreement. There is a trail that by design connects Ward Canyon Park with the school.	Marianne Greene
Good ideas-- Home avenue is in need of more community gathering spots, businesses, greenery. And where the Fairmount Neighborhood touches the 15 freeway (left side of the map), there should be a pedestrian bridge that connects to the South Park neighborhood. We need to literally bridge our communities together. There should be a bike path the connects through Fairmount Park to South Park, into Downtown.	Cynthia Tecson
I live nearby in North Park, but frequently ride my bike as far East as I can on Landis Street, so I'm excited that you'll be continuing the safe bike infrastructure connecting Landis to University and over towards La Mesa. I would certainly use this!	Nicholas Albanese

I am thrilled to see the possible expansion of the freeway lids North and South of the park, as it: - weaves together historically underrepresented communities torn apart by the freeway - creates more green and recreation space - will help with air quality and noise abatement from the freeway - provides opportunities for activated spaces, recreation and community engagement - is a well-needed amenity, in a dense area that lacks access to a high quality park within walking distance like more affluent neighborhoods It seems like there's potential to have a community garden or co-op with all the new green space as well - even if it's not in this park...	Nicholas Albanese
Build the PURPLE LINE now! Increase class iv cycle tracks as soon as possible. Add rapid bus routes right away. We don't need more studies. We know these things are good!	Daniel Lauridsen
You people are so ridiculous. all you wanna do is tax tax tax to pay for ridiculous things like expensive bike planes when I was a kid we never had any by planes and didn't need them. You can't even keep the bathrooms open at the beach. You have paid parking in Balboa Park that hasn't been there for 100 years. How in the hell are you supposed to be able to do anything?	Gene
Keep the bathrooms open first before you do anything	Gene
This completely destroys our community. As a native San Diegan, and Normal Heights resident over 50 years, adding 30,000 additional dwellings will devastate our community and overwhelm services. We already now suffer from a lack of privacy with ADUs towering over my backyard, I cannot park in front of my home, and the speeding that goes on in my community is simply out dangerous and reckless. All of this will continue to worsen by bringing more people into a crammed space. I choose to remain in San Diego because it has never felt like a concrete jungle, but that is what is being forced upon its residents. Work on providing additional commuting opportunities if that many people need to work downtown... we are not some big industry or financial megapolis needing workforce housing.	Kandi Rehard
I think there needs to be more emphasis on rapid transit in the community. As mentioned several times in the draft, mid city could reach 227,000 residents, and there are no plans for rail expansion besides the purple line, which doesn't help move people within mid city, just through mid city. If there were plans for a rail line along El Cajon blvd, following the route of rapid 215, we could be better prepared for the influx of new residents.	Michael Damsky
The Normal Heights community is already very dense and adding buildings/population can't be supported by infrastructure.	Cindy
Maintaining the small bungalow style structure, look & scale.	Cindy

Please work to conserve the open space, canyons & trees of Normal Heights. At lea	Cindy
Please work to underground the electrical & extra wires.	Cindy
ADA support is important.	Cindy
More parks with parking	Cindy
We need to zone all of the area involved as “library”, for the parts thst can be endless rebuilt, densified, and even industrialized without review, and zone all not to build parts and closed areas as “balboa park paid parking” and “mission bay public bathrooms”. Dont forget to add public subsidized arena, sports stadium, and convention center to the plan. Make sure no single city office or facility remains in the area plan.	anon emus
what a waste od space	anon emus
Although it is admirable to increase parks and open space further north, the community of Fairmount Park was completely isolated from communities to our west when Interstate 15 was constructed. Historic maps of the area show that before the freeway, residents could connect to the west via Hazel St or Federal Blvd. After the freeway was built, the only way residents of this community can travel via bike or foot to any community to our west is by traveling north and east into Azalea Park, skirting around the Manzanita Canyon open space into City Heights and then crossing the freeway at Wightman St. This means, for me, I must bike/walk over four miles to reach the neighborhood of South Park, even though that neighborhood is less than 700 ft from my house. This is not only a serious inequity for the residents of this neighborhood, but also represents a fundamental gap in any infrastructure which seeks to connect eastern San Diego bicycle traffic to Balboa Park and the downtown area.	Nate Parde
more sidewalks and hiking paths add sidewalks in the neighborhood	Carlos Contreras
Bernadini little league baseball field Complete the baseball field for our children	Carlos Contreras
Please build more housing.	Jacob Penglase
The proposed Class III Enhanced bike classification on Adams Avenue between SR 15 and I-805 does not meet the safety needs of cyclists. This section of Adams Avenue sees a high volume of automobile traffic with around 10,000+ average daily traffic in each direction. Along with a high volume of bicyclists, this section of Adams Avenue is a hot spot for bicyclist injuries from car collisions according to the Statewide Integrated Traffic Records System. Class IV bike lanes with physical separation are preffered for this section of Adams Ave. Class IV bike lanes are the safest option, as they reduce conflict points with automobiles and physically protect cyclists. To maintain parking on Adams Avenue, the parking may be floated, as has been done on 30th street, to both protect cyclists and maintain parking access.	Bob

While the proposed Class IV bike facilities on Fairmount Ave and 43rd St are the safest and best option for bicyclists on this route, the roadway width and parallel nature of both Fairmount Ave and 43rd St offer a unique opportunity for improved transit connectivity and circulation, alongside safe bicycle facilities. Both these corridors pass through the historic commercial center of City Heights, one of San Diego's most dense neighborhoods, which contains census tracts with some of the lowest rates of car ownership citywide. Converting Fairmount Ave and 43rd St to one-way couplets opens up dedicated space for bus lanes while preserving two travel lanes in each direction, parking on one side of the street, and Class IV bicycle facilities. At roughly 66 feet of public right-of-way on both Fairmount Ave and 43rd St, there is more than enough space to reconfigure both roadways to include dedicated transit lanes on one or both corridors that would speed up buses, reduce conflict points, and improve service reliability. MTS route 13, which connects Mid-City residents to the Green Line trolley to the north and the Orange and Blue Line trolleys to the south, as well as a future Purple Line station, runs along Fairmount Ave for a significant portion of its route. Route 13 has the highest ridership of any one MTS bus route, with around 7,000 average weekday boardings according to SANDAG's Transit Ridership Dashboard. I am suggesting that bus lanes be added to the Planned Mobility Map (Figure 6-2) along Fairmount Ave from El Cajon Blvd to Thorn St, or alternatively in one direction on both Fairmount Ave and 43rd St along the same section. Additionally, I am suggesting that Policy 6.10 be revised to include a study to analyze bus lanes on Fairmount Ave/43rd St, or to create a new policy that explicitly mentions studying or analyzing a potential bus lane on Fairmount Ave/43rd St. Including a potential bus lane on Fairmount Ave/43rd St in the Mid-City Communities Plan would help the City of San Diego and SANDAG to implement future transit enhancements more easily on this corridor that serves one of San Diego's densest, car-free neighborhoods.	Bob
a) Why are trolley lines and stops shown on the map? Nowhere in Mid-City is within reasonable walking distance of a trolley stop. b) Strong support of Class II bike land on Mountain View and Madison between Cherokee & 40th - the excessive width of this street encourages speeding. Painting bike lanes will narrow it and hopefully have an impact on the speeding. c) Rapid 280 is an express bus that has no stops in Mid-City. Why is it shown on the map?	Al Harjala

a) Because of the color choices used in Figure 2-1, I cannot tell which residential land use applies where. It would be helpful to use non-color-based indicators like are used with community commercial land uses in the figure. b) Fully support. The LDC needs to be amended to allow. Current 10% max on commercial makes sense for large buildings, but continues to not allow traditional 2 story corner stores with commercial on ground level and 1 floor of residential above.	Al Harjala
Considering the plan calls for allowing corner stores in residential areas, it might be helpful to have an explanation of how historically the western part of mid-city was filled with corner stores until zoning banned new ones and only allowed the continued operation of those already in existence as continuing non-conforming uses. Normal Heights, for example, had 16 when zoning was imposed on the neighborhood in 1930. In 1960, there were still 12. Since 1976, there have been only 3. They were a common and essential part of the neighborhood until zoning required them to gradually die out. It is amazing that 3 have managed to continue for almost 100 years.	Al Harjala
One significant problem with the current LDC is the overemphasis on requiring all sorts of mostly aesthetic building design elements. This is how we ended up with apartment developers installing unnecessary fireplaces (former chimney requirement) and ridiculous non-functional facades and roofs that cost a fortune to replace - driving up costs and rents in the name of box-checking. Should the city be acting like an HOA architectural committee?	Al Harjala
There is no joint use park at Normal Heights Elementary. What was supposed to be joint use has never been open to the public. The gates are always locked.	Al Harjala
How is parking going to be established? Parking is already horrible and the city has not done enough to promote more housing when you can't even find parking?	Will Flores

I am writing to submit my formal public feedback regarding the first draft of the Mid-City Communities Plan Update. As the city looks to promote walkability, bike ability, and climate-resilient active transportation, I want to formally propose the inclusion of a dedicated Class 1 pedestrian and bicycle bridge across the I-15 freeway to reconnect the neighborhoods of Fairmount Park and South Park. Historically, the construction of the regional freeway network heavily fractured our local street grids. Today, the Fairmount Park neighborhood finds itself highly isolated, severely cut off from adjacent communities by three major freeways (the I-15, SR-94, and I-805). While Fairmount Park residents live directly across the freeway corridor from the vibrant commercial, transit, and open-space networks of South Park and Greater Golden Hill, there is currently no safe, direct, or realistic way to walk or bike between these two areas. To meet the ambitious goals of the City's Climate Action Plan, our infrastructure must provide safe, pleasant alternatives to vehicular travel. A dedicated pedestrian and bicycle overpass bridging the I-15 would directly solve this challenge by: • Reconnecting two historically severed historic neighborhoods. • Providing Fairmount Park residents safe, vehicle-free access to South Park's amenities. • Creating a continuous active transportation loop linking local canyon trails. • Enhancing park and infrastructure equity for an isolated community pocket. Given that city working groups have already begun exploring freeway-spanning pedestrian connections, I strongly urge the planning team to officially evaluate and incorporate this Fairmount Park-to-South Park active mobility connection into the final Mid-City Communities Plan Update. Thank you for your time, dedication to our community, and consideration of this critical infrastructure improvement.	Kevin Schaer
We need more access to public parks in the Fairmount Park Neighborhood	Kevin Schaer

I am writing to provide specific public feedback on the first draft of the Mid-City Communities Plan Update, with explicit reference to the "Street Tree Corridors" concept outlined on Page 64. I strongly support the City's vision to develop dedicated street tree corridors to combat the urban heat island effect and improve neighborhood walkability. However, to ensure the long-term sustainability and survival of these trees without straining our potable water supply, I propose that the City explicitly incorporate passive stormwater-harvesting infrastructure directly into the design guidelines for these corridors. Specifically, the city should look into the community-led model pioneered by the Dunbar/Spring Neighborhood Foresters in Tucson, Arizona (https://dunbarspringneighborhoodforesters.org/). By utilizing street curb cuts, curb cores, and roadside basins, they successfully redesigned standard street parkways into active rain gardens that irrigate a dense canopy using free street runoff. To see a direct visual demonstration of how this infrastructure works and impacts a neighborhood, I highly encourage the planning team to watch this brief documentary detailing the project: Free Water Rainwater Harvesting Pioneer (https://www.youtube.com/watch?v=lQ-jdUGCxcc). Integrating this water-harvesting framework into the Page 64 Street Tree Corridors would directly achieve multiple city goals by: • Using free urban stormwater runoff as the primary irrigation source for the new corridors. • Maximizing the growth, canopy size, and health of native, low-water-use trees. • Preventing localized street flooding by capturing and filtering runoff before it enters the storm drains. • Lowering neighborhood temperatures significantly to fight the urban heat island effect. I urge the planning department to amend the guidelines on Page 64 to require or incentivize curb cuts and recessed planting basins within these designated tree corridors, and to establish streamlined permits for community-led watering basins. Thank you for your dedication to building a more resilient Mid-City.	Kevin Schaer
There is zero extra land already in Kensington, so there is zero space to add the parks and public gathering spaces mentioned in this section if density is added.	Karl Peterson
Adding density to the Kensington neighborhood is a bad idea. Kensington is historically significant and new construction would destroy the character. The streets are also extremely narrow, and adding density would make it even more difficult to get out of the neighborhood especially in case of emergency. Kensington also is surrounded by canyons which pose a higher fire risk. Finally, based on the city's "affordable housing" concept of affordable housing the "affordable" units would rent at a percentage below market rate which in Kensington would still be extremely expensive. You still would have to be rich to afford to rent (or own) in Kensington even at a percentage discount so this does not solve anything.	Karl Peterson

There will be zero historic preservation under the plan. Literally EVERY added density housing examples shown in the proposal are the same ugly cliche “modern” box look builders like because they are cheap to build. Anyone with eyes can tell these ugly buildings would not match the historic character of Kensington and would destroy the character of the neighborhood.	Karl Peterson
Some key elements stated include preservation of habitat and maintaining fire safety. Adding density to Kensington would in no way maintain the canyon habitat and would very much decrease fire safety.	Karl Peterson
Bicycling is not the answer. People travel with more stuff these days. Books, papers, computers, etc. Bicycles are not safe for families with small children. The helmets that are required for safe travel become cumbersome once you arrive at your destination, so members avoid using them. Bicycle lanes take up valuable street space that cars and traffic could flow on. With climate heat temperature raising and UV rays increasing, being exposed to heat and sun while on a bicycle is unhealthy. Not enough usage will happen, so the valuable space planned for bike usage will be vastly underused. Traffic will increase by two-fold if bike lanes are built to take up car lanes. Greater gas usage will occur as cars have to drive out and around of the main corridors of El Cajon and University Ave. As a local home owner in these projected areas, I am heavily saddened and disappointed by the proposed plans.	Sarah Flora
I support the Transition Development concept shown in Figure 5-9 and ask the City to evaluate extending the transition area south of Amherst Street to include immediately adjacent residential parcels, including APN 468-282-14-00. A stepped-down increase in residential development capacity south of Amherst could provide a more gradual transition between the planned higher-density El Cajon Boulevard corridor and the existing lower-density neighborhood.	Edward Orysiek

I currently reside at the property associated with APN 468-282-14-00, immediately south of Amherst Street and the Transition Development area shown in Figure 5-9 for the El Cajon Boulevard/Montezuma Road-to-73rd Street study area. I support the proposed increase in housing and development intensity along this corridor and ask the City to evaluate whether the Transition Development area, or another appropriate stepped-down residential designation, should extend south of Amherst Street to include nearby parcels such as APN 468-282-14-00. Given the planned higher-density development along El Cajon Boulevard, providing additional residential development capacity on immediately adjacent properties could create a more gradual transition between the corridor and the existing lower-density neighborhood while also supporting the Plan's housing goals. Please also confirm the proposed land-use designation and any contemplated zoning or overlay changes for APN 468-282-14-00 as the Second Draft is prepared.	Edward Orysiek
I support the up-zoning proposed for my street (4600 block of Biona) due to its proximity to transit, and the up-zoning proposed for my neighborhood because it's long past time for Kensington to contribute its fair share of new housing to help address our housing crisis. The land use proposal is a fair balance of necessary up-zonings to address the exclusionary (down)zoning of previous Mid-City Plan Updates, while keeping areas further from transit (north areas of Kensington, Normal Heights and Talmadge) apparently unchanged, to appease those residents who oppose any change to their neighborhoods.	Paul Jamason
The current proposal for a Class III Enhanced bike facility is not sufficient for the current level of automobile throughput and speed on Adams Avenue. The Class III Enhanced bike facility is designed for roads with much lower average daily traffic counts than Adams Ave currently experiences. That is why a Class IV physically protected and separated bike facility on Adams Ave should be included in the Planned Mobility Map between I-805 and SR-15.	Paul Jamason

Within the major corridors identified in this transit plan light rail lines should be included. Light rail is faster and safer than busing, while also more effective at reducing traffic and congestion. Light rail does not need to exclusively be used along the city freeways as an alternative to high speed driving. It can and should be used as consistent transit to travel within neighborhoods. Look at cities like Tucson with its Sunlink that have included light rail lines that only run along main streets within neighborhoods. In every single city that has done this saw increased development and economic activity along the desired corridors. If these communities already have slower light rail lines in place the transition to using the purple line when constructed would be automatic and natural for the citizens there. Regarding bringing other communities into these commercial areas, having light rail lines in place when the purple line is built would grant others access to all of Midcity, not just the areas next to the trolley stops. As a last point, Midcity is located near other high density communities like North Park. Once slow light rail lines are placed, it is easy to extend them to other communities. North Park, for example, would benefit greatly from being connected via light rail to its neighboring communities.	Sean Fritz
The plan currently states that MTS route 210 is not planned to begin until 2032. There is no reason to delay implementation of this route for such a long time. Right now the #10 route is the only public transit way to get from City Heights to the edge of the coast, especially Ocean Beach and the shores further north. As is, the route takes far too long to transit to and from Old Town station and is a critical impediment for City Heights' growth. Adding the 210 and potentially other east-west rapid transit routes should be a priority to make MTS a viable transit option between these major parts of the city.	Grant Vousden-Dishington
Webster does not have any parks. The green alley project is great AND it will not be a play area for children, soccer, etc. The community wants a joint use field at Webster Elementary. The parents at Webster rallied and have now gotten a field added to the modernization plan at Webster. Please coordinate with SDUSD to get a joint use field at Webster.	Jessica Arreguin
After considerable work and coordination with Heritage Preservation staff, it was determined that the Talmadge Park Estates Historic District would be considered in its entirety for local historic district consideration, encompassing both Talmadge Park Unit 3 and Talmadge Park Estates Unit 1. The current draft, however, refers only to “Talmadge Park.” For accuracy and clarity, I respectfully request that the draft use the district’s full name, Talmadge Park Estates Historic District, or include a footnote referencing the updated Mid-City Focused Reconnaissance Survey Report, pages 34–35, which documents the full area being considered for local designation.	LAURA L HENSON

Request to Retain Existing Residential Development Intensity in the Talmadge Park Estates Historic District Listed on the National Register of Historic Places Dear City Planning Department: I am writing on behalf of the Talmadge Historical Society regarding the proposed Mid-City Communities Plan Update and, specifically, the proposed increase in development intensity within the Talmadge Park Estates Historic District. We support the City's goal of creating additional housing in Mid-City. However, we respectfully request that the City retain the existing residential land-use designation and development intensity throughout the boundaries of the Talmadge Park Estates Historic District. The principal concern is not the number of dwelling units permitted on a lot, but the proposed increase in allowable building mass. Existing ADU regulations already allow multiple dwelling units on qualifying residential lots. The proposed Community Plan would make a different and potentially much more consequential change by increasing allowable floor area ratio (FAR) from 0.60 to 1.25—more than doubling the permitted floor area. Because many existing homes in the district are built at approximately 0.40 FAR, development approaching 1.25 FAR could contain more than three times the floor area of a typical existing property. That increase in the development envelope—not simply whether a property contains two, four, or more dwelling units—is the potential impact the district would see and experience. For a historic district, this distinction is critical. A substantial increase in permitted building mass can alter the relationships among buildings, lots, setbacks, scale, streetscape, landscaping and overall development pattern that collectively define the district's historic character. Talmadge Park Estates was listed on the National Register of Historic Places in March 2024. It represents an unusually intact example of a small-house neighborhood largely developed during the Great Depression and includes important examples of San Diego's architectural and housing history.	LAURA L HENSON

... (continued) The significance of Talmadge Park Estates does not rest solely upon a collection of individually important houses. Its historic character is expressed through the relationship among its buildings, lots, setbacks, scale, streetscape, landscaping and overall development pattern. It is the district as a whole that constitutes the historic resource. The Municipal Code Recognizes the Historic District as a Whole This distinction is particularly important when considering the difference between contributing and non-contributing properties within Talmadge Park Estates. San Diego's Historical Resources Regulations apply when a historical district is present. Section 143.0210 provides that where a historical resource is located, the Historical Resources Regulations apply, and Table 143-02A establishes the applicable review framework for designated historical resources and historical districts. National Register Districts are included in this regulation. More importantly, §143.0250 defines an “alteration” broadly to include a change to: “any property located within a historical district” and specifically includes such activities as exterior changes, grading, paving, landscaping and the addition of a new structure must be carefully considered. The Code does distinguish between historically significant and non-significant structures. Section 143.0220, for example, specifically addresses substantial alteration of a non-significant structure within a historic district. However, that same section separately provides that new construction within a historic district is not automatically exempt from the requirement for a Site Development Permit, when it meets the applicable requirements. Section 143.0251 is particularly significant. It provides that new construction within a historical district may be permitted when it does not adversely affect the special character or special historical, architectural, archaeological or cultural value of the resource and is consistent with the Secretary of the Interior's Standards and Guidelines. Development affecting a historical district must also provide mitigation for impacts to the resource as a condition of approval.	LAURA L HENSON

...(Continued)Mid-City contains extensive commercial and transit corridors—including El Cajon Boulevard, University Avenue, Fairmount Avenue and Euclid Avenue—where substantial additional housing can be accommodated. Our preliminary analysis of El Cajon Boulevard alone, from I-15 to Collwood Boulevard, indicates that a five-story mixed-use model—ground-floor commercial space with four residential floors—could potentially accommodate approximately 2,500 to 3,000 additional homes, while allowing many existing businesses to remain and strengthening the commercial corridor. This is a planning-level estimate rather than a parcel-certified capacity study. Nevertheless, it demonstrates why realistic corridor capacity should be quantified before substantially increasing allowable development intensity within a National Register historic district. Kensington-Talmadge Already Contributes Affordable and Multifamily Housing Kensington-Talmadge should also not be characterized simply as a community that has failed to participate in the City's housing objectives. Our research has identified approximately 457 deed-restricted affordable homes within Kensington-Talmadge, in addition to naturally occurring lower-cost apartments and other multifamily housing. Talmadge itself already contains substantial multifamily development directly outside the historic district. The appropriate question therefore is not whether Talmadge should accommodate housing. It already does. The question is whether meeting additional housing objectives requires substantially increasing the permitted building mass and development intensity within one of Mid-City's few nationally recognized historic residential districts.	LAURA L HENSON

...(Continued) The City's Historic Preservation Planning Section describes the purpose of these regulations similarly: to protect and preserve San Diego's historical resources and to ensure that development occurs in a manner that protects their overall quality. These provisions establish an important preservation principle: A non-contributing property is not isolated from the historic district merely because the existing structure on that property does not itself contribute to the district's historical significance. Redevelopment of a non-contributing property can still affect the historic district through changes in height, massing, setbacks, lot coverage, building orientation, landscaping and overall development pattern. This concern becomes substantially greater when the underlying land-use policy permits a development envelope potentially several times more massive than the buildings that presently characterize the district. For that reason, we believe it would be poor preservation planning to substantially increase allowable development intensity on non-contributing properties within Talmadge Park Estates Historic District. The appropriate place to distinguish between contributing and non-contributing resources is in reviewing alterations to individual properties. It should not be used as the basis for fragmenting the historic district when establishing its long-term land-use policy. The City's existing Municipal Code recognizes that new construction within a historic district can affect the district even when the structure being replaced is not itself historically significant. The Mid-City Community Plan should reflect that same principle. The City Can Accommodate Substantial Housing Growth Without Sacrificing a Historic District The question should not simply be: Where can greater development intensity legally be placed? It should also be: Where can additional housing be accommodated with the greatest public benefit and the least loss of irreplaceable community resources?	LAURA L HENSON

...(Continued) Historic Districts Are a Finite Resource Housing can be constructed in many locations. A historic district cannot be reconstructed once its integrity has been lost. The significance of Talmadge Park Estates depends upon the cumulative relationship among its buildings, lots, setbacks, scale, streetscape and development pattern. Incremental redevelopment that alters those relationships can eventually undermine the characteristics for which the district was recognized. Increasing allowable FAR from 0.60 to 1.25 would establish a development envelope fundamentally different in scale from much of the existing district. This is precisely why historic-district preservation cannot depend solely upon protecting individual contributing houses one at a time. The district itself is the resource. A Better Alternative We believe Mid-City can accommodate significant housing growth while simultaneously protecting its historic neighborhoods. We therefore encourage the City to: 1. Retain the existing residential land-use designation and development intensity, including the existing allowable FAR, throughout the Talmadge Park Estates Historic District, including both contributing and non-contributing properties. 2. Quantify realistic housing capacity along Mid-City's commercial and transit corridors before substantially increasing allowable development intensity within established residential neighborhoods, including designated historic districts. 3. Encourage mixed-use redevelopment along corridors such as El Cajon Boulevard that retains neighborhood-serving businesses while adding housing above them. 4. Encourage adaptive reuse along transit corridors rather than the destruction of historic resources. This approach is not anti-housing. It is an argument for better placement of housing to better serve all of Mid-City.	LAURA L HENSON

...(Continued) Mid-City can create thousands of new homes, support transit, strengthen walkable commercial districts, retain neighborhood-serving businesses, and protect irreplaceable historic resources at the same time. We can build up without unnecessarily building out into historic neighborhoods. We therefore respectfully request that the City revise the draft Mid-City Communities Plan to retain the existing residential land-use designation, allowable FAR and development pattern throughout the Talmadge Park Estates Historic District, including both contributing and non-contributing properties. Thank you for your consideration and for the opportunity to participate in the Mid-City Communities Plan Update.	LAURA L HENSON
1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Richard Hughes
1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Jennifer Homer
1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Ramona Najimy

1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods. As a 40 year resident of Talmadge, I am appalled by your callous treatment of our thriving community. Yes, we need new affordable housing but why destroy a thriving historic community rather than pushing for redevelopment in and near El Cajon Blvd. where there is a need for redevelopment.	J. David Archibald
1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Ginger Weatherford
1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Diana Carnahan

The Draft Mid-City Communities Plan acknowledges that more than half of Mid-City is within a Very High Fire Hazard Severity Zone (VHFHSZ) and that additional fire resources “may be needed” depending on future development. For a 30-year plan proposing increased development capacity in a high-fire-risk community, “may be needed” is inadequate. The City should determine what fire resources and evacuation capacity will be required before approving additional density—not after development occurs. The Plan also fails to adequately address an equally critical issue: evacuation and emergency access. Talmadge experienced this problem firsthand during the October 31, 2024 Montezuma Fire. Residents were trying to evacuate while fire engines were trying to enter. Fire engines were observed struggling on narrow Aldine Drive as motorists attempted to make room as they attemped to evacuate. The Draft Plan now proposes increased development capacity on narrow residential streets residents depend upon for evacuation. Many of these streets have only one way in or out and do not provide 20 feet of unobstructed width. San Diego's fire-access standards generally require fire apparatus access roadways to provide at least 20 feet of unobstructed width. There is also an apparent factual error that should be corrected. Page 144 states that Mid-City is served by six fire stations, but the Plan identifies only five existing stations: Stations 10, 14, 17, 18 and 26. The potential future station near Fairmount Avenue and 47th Street, that would service Kensington and Talmadge, should not be counted as an existing station. The City should clarify and correct this discrepancy in the final Plan.	LAURA HENSON

... (Conitnued) The Plan discusses brush management, building design, additional staffing, expanded stations and a potential future fire station. Those measures address fighting fires. They do not answer the fundamental evacuation question: Why is the City deciding how much additional development these streets should accommodate before determining how many people they can safely evacuate? Before increasing development capacity in these areas, the City should conduct a comprehensive evacuation and emergency-access analysis using the October 31, 2024 fire as a real-world case study. It should then model the same emergency with the additional residents and vehicles anticipated by the Plan and under strong Santa Ana wind conditions. Mid-City can accommodate substantial new housing along El Cajon Boulevard and other major commercial corridors, where growth, infrastructure, emergency access and fire protection can be planned together. A 30-year community plan should not increase development first and determine whether adequate fire resources and safe evacuation routes exist later. “May be needed” is not a fire-safety plan.	LAURA HENSON
1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City’s commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Jennifer Rickard

I do not support increased density that does not address evacuation capacity within Talmadge and other VHFHSZs. 1) Talmadge contains many narrow streets that do not provide a 20' wide access for fire engines and evacaution when parking occurs on both sides of a narrow street. 2) Talmadge contains four areas for which there is only a single egress for more than 30 households (per AB 2911 Subdivision Review Program). 3) Overall, the residential area is primarily exited through intersections that become chokepoints, particularly the 4-way stop at Euclid and Monroe, enroute to the primary evacuation corridors which connect to the freeways. The plan does not address improvements that could enhance the value of Monroe as a neighborhood connector and evacuation route. 4) Alternative evacuation routes use neighborhood grid streets to head south to El Cajon Boulevard (ie Winona). Increased density between ECB and Monroe will eliminate this alternate route. If density is to be increased here, road changes and parking requirements must be part of the plan so that evacuation and safety are not endangered. Fire and evacuation needs should be determined before additional development capacity is approved.	Sarah Axford
"Aldine Drive is identified as a Green Corridor: Bike and Pedestrian connection. This is NOT a safe route. It is dangerous for the bicyclists, walkers, and drivers. The road is not built for the current usage and has no shoulder. This is NOT a green pedestrian route! Instead, this open space is a source of illegal camping and fire ignition risk. The area defined by Aldine/Fairmount/Hoover should be one of the Urban Design Study Areas. How can this area be redesgined to 1) improve evacuation and commuting? 2) Increase safe neighborhood connection for bicyclists and pedestrians 3) Increase park space?	Sarah Axford
1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Jan Taylor

1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Misha Moore
Adams Avenue between Park Boulevard and Van Dyke Ave should have separated bike lanes	Spencer Rendano
I have been informed that the proposed Mid-City Plan for San Diego will allow 6 to 8 story apartment/condo units in the Kensington area from El Cajon Bl. to Alder, which is one block north of Adams Ave. I have seen the devastating effect this high-density construction is doing in Hillcrest and strongly oppose any attempt to do the same in Kensington or other lower density neighborhoods, which give much of our inner city the unique enclaves that make San Diego special. Not only does this dramatically change the nature of these small older communities, but this proposed plan also goes against the concept of creating affordable housing. I have seen numerous affordable small apartment complexes and duplexes torn down to construct high-priced mega-structures; and the few affordable unit offsets touted by developers don't come close to replacing the many truly affordable units lost to create these giant apartment complexes. There is also an element in this plan that seems to echo the mistakes of the 1950s, when inner city neighborhoods were targeted for high-density to avoid the political desire to leave the suburbs undisturbed. It didn't work then and I doubt it will be any more successful today. I hope you will reconsider the Mid-City Plan and, if some high-density is needed, restrict it to a much smaller area along El Cajon Bl., which is in need of redevelopment but won't destroy the existing small and unique residential communities San Diegans love.	Don Taylor
Ideally, we'd lean into the history of Mid-City you mention and plan for an East-West trolley system on El Cajon and University that runs between the Orange and Green Trolley lines. In lieu of efficient public transportation in the form of a trolley system, this plan should be able to support the people it hopes to bring into the area before they get there! This could be done by providing a guaranteed infrastructure plan in the form of parking and bus upgrades.	Jeffery Wiederkehr
Historic neighborhoods should be protected from urban sprawl.	Jeffery Wiederkehr

While city planners state an intent to preserve the unique character of Kensington-Talmadge and surrounding neighborhoods, blocks that are currently single-family-oriented could gradually evolve and the character of those neighborhoods would be lost. Protections should be put in place. There are no protections for transportation, street parking, local traffic, and public facilities. They must be expanded to match housing growth.	Jeffery Wiederkehr
Please keep exisiting residential LU designation and allowable FAR throughout ENTIRE Talmadadge Park Estates Historic District. Multi story ADUs are simply a bad idea. They ruin the livibility of any neighborhood.	Barbara Kent
Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods. Governor Gavin Newsom supports Historic Districts in California and so do I.	Diana Carnahan
I just want to say that you are making it very difficult for people to express their opposition to the plan to increase high density building in these neighborhoods. Most people don't have time to read a document that is hundreds of pages long. If you really wanted feedback, you would not require people to choose a section of the document that they want to comment on and instead would just allow people to send in their comments without having to go through a survey like this. I just saw a lot of concern expressed over Nextdoor about all the development that has been taking place in other neighborhoods in San Diego. People are concerned about parking, traffic congestion, demands on electric electricity and water, and changing the relaxed feel of a neighborhood.	Cynthia Lee
I am opposed to high-density building in Kensington. We have lovely single-family dwellings and the parking is already terrible the closer you get to Adams Avenue. Already, allowing ADUs has caused a lot of congestion on what used to be quiet, easy to park streets. Building high density buildings will cause more congestion, more traffic, and a decline in the quality of life.	Cynthia Lee
Let's do it. Break up those giant big box stores and build something resembling a real community on the space with housing, mixed use and pedestrian connection to the Chollas Lake. Those massive parking lots are an eye sore and they are rarely even filled.	Brandon Payne

Great ideas focusing on the pedestrian environment and the future alignment with Purple Line. Please keep focusing on the pedestrian experience since that is the most basic form of transportation for everyone from young to old. And please do everything possible with SANDAG and MTS to make Purple Line a reality.	Brandon Payne
I live in North Park between Monroe and Meade, my son goes to Adams Elementary, and Adams Ave is the commercial area our family uses most. We would LOVE to bike Adams more but it doesn't feel safe to do so. It would be fantastic if the plan included more bike infrastructure for Adams Ave.	Shifra Goldenberg
"- (1) A Class IV physically protected and separated bike facility on Adams Ave should be included in the Planned Mobility Map between I-805 and SR-15. A class IV bike lane will protect cyclists on this busy thoroughfare and make it safer for both drivers and cyclists alike who will have fewer interactions. When I drive on Adams I'm nervous with bikes in the road - and when I'm biking I'm nervous with the amount of cars. Local businesses already support the class IV lanes and the City should lead the way in safety and cheap transportation for its residents. - (2) While the proposed Class IV bike facilities on Fairmount Ave and 43rd St are the safest and best option for bicyclists on this route, the roadway width and parallel nature of both Fairmount Ave and 43rd St offer a unique opportunity for improved transit connectivity and circulation, alongside safe bicycle facilities. Both corridors pass through the historic commercial center of City Heights, one of San Diego’s densest neighborhoods, which contains census tracts with some of the lowest rates of car ownership citywide. The proposed plan also rezones ample parcels that will induce the need for more public transit. Converting Fairmount Ave and 43rd St to one-way couplets opens up dedicated space for transit-only lanes while preserving two travel lanes in each direction, parking on one side of the street, and Class IV bicycle facilities. I request that bus lanes be added to the Planned Mobility Map (Figure 6-2) along Fairmount Ave from El Cajon Blvd to Thorn St, or in one direction on both Fairmount Ave and 43rd St along the same section. Additionally, I am suggesting that Policy 6.10 be revised to include a study to analyze bus lanes on Fairmount Ave/43rd St, or to create a new policy that explicitly mentions studying or analyzing a potential bus lane on Fairmount Ave/43rd St. Including a potential bus lane on Fairmount Ave/43rd St in the Mid-City Communities Plan would help the City of San Diego and SANDAG to implement future transit enhancements more easily on this corridor that serves one of San Diego’s densest, car-free neighborhoods. "	Lawrence Vulis

I moved to the Kensington Neighborhood because one could live in a city but also in a neighborhood of single family homes. Urban Design will force people who want to live in single family homes out to the "burbs" as in the 50's and 60's. It took 40 years to make cities live-able to families of all financial situations again. Yes we need more affordable housing but this housing will not be affordable. Look at Mission Valley where all the apartment homes have been built, built, built and still are being built but occupancy is only at 10%. We do not need neighborhoods of vacant buildings as that will only bring squatters, decay, etc.	Patricia Benjamin
"Please explain why the draft places a notable concentration of Townhome-designated areas in Talmadge, including within the historic district, while Townhome designations appear more limited elsewhere in Mid-City. Remove the proposed Townhome designation from within the National Register-listed Talmadge Park Estates Historic District. "	LAURA L HENSON
"Preserve historic neighborhood scale. The historic district's historic significance includes not just individual houses, but its modest building scale, setbacks, yards, landscaped parkways, streetscape and open space. Direct greater density to commercial corridors. Concentrate new mixed-use housing along El Cajon Boulevard and other appropriate commercial/transit corridors, where additional housing can also support businesses, walkability and revitalization. Learn from City Heights. Mid-City has already experienced the consequences of poorly integrated infill during the 1960s and 1970s. New housing should be planned in ways that preserve livability, landscaping and appropriate neighborhood scale."	Ramona Najimy

" Review Figure 1-2 for equitable distribution. Explain why the draft places a notable concentration of Townhome-designated areas in Talmadge, including within the historic district, while Townhome designations appear more limited elsewhere in Mid-City. Remove the proposed Townhome designation from within the National Register-listed Talmadge Park Estates Historic District. Preserve historic neighborhood scale. The historic district's historic significance includes not just individual houses, but its modest building scale, setbacks, yards, landscaped parkways, streetscape and open space. Respect the meaning of "Estates." Talmadge Park Estates was intentionally planned with light, air, yards, setbacks and landscaped streets. These spaces are part of the neighborhood, not leftover land waiting for development. Direct greater density to commercial corridors. Concentrate new mixed-use housing along El Cajon Boulevard and other appropriate commercial/transit corridors, where additional housing can also support businesses, walkability and revitalization. Consider fire safety and emergency access. Evaluate increased building mass and reduced setbacks in conjunction with Mid-City's narrow streets, canyon areas, evacuation constraints and firefighters' need for access around structures. No density at the entrance of the district which is in a Very High Fire Hazard Severity Zone. Learn from City Heights. Mid-City has already experienced the consequences of poorly integrated infill during the 1960s and 1970s. New housing should be planned in ways that preserve livability, landscaping and appropriate neighborhood scale. "	Lynn Mercer
Remove the proposed Townhome designation from within the National Register-listed Talmadge Park Estates Historic District.	Diana Meier
"1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods."	Ken Kaufman

"Direct greater density to commercial corridors. Concentrate new mixed-use housing along El Cajon Boulevard and other appropriate commercial/transit corridors, where additional housing can also support businesses, walkability and revitalization. Consider fire safety and emergency access. Evaluate increased building mass and reduced setbacks in conjunction with Mid-City's narrow streets, canyon areas, evacuation constraints and firefighters' need for access around structures. No density at the entrance of the district which is in a Very High Fire Hazard Severity Zone."	Joanne Ensign
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Full of lies and misrepresentation of the homeowners in the neighborhoods that are affected.	Denise Madruga
"Concentrate new mixed-use housing El Cajon Boulevard and other appropriate commercial/transit corridors, where additional housing can also support businesses, walkability and revitalization. Remove the proposed Townhome designation from within the National Register-listed Talmadge Park Estates Historic District."	Duane Brown

"Preserve historic neighborhood scale. The historic district's historic significance includes not just individual houses, but its modest building scale, setbacks, yards, landscaped parkways, streetscape and open space. Respect the meaning of "Estates." Talmadge Park Estates was intentionally planned with light, air, yards, setbacks and landscaped streets. These spaces are part of the neighborhood, not leftover land waiting for development. Direct greater density to commercial corridors. Concentrate new mixed-use housing along El Cajon Boulevard and other appropriate commercial/transit corridors, where additional housing can also support businesses, walkability and revitalization."	Kurt Stolle
"Review Figure 1-2 for equitable distribution. Explain why the draft places a notable concentration of Townhome-designated areas in Talmadge, including within the historic district, while Townhome designations appear more limited elsewhere in Mid-City. Remove the proposed Townhome designation from within the National Register-listed Talmadge Park Estates Historic District. Direct greater density to commercial corridors. Concentrate new mixed-use housing along El Cajon Boulevard and other appropriate commercial/transit corridors, where additional housing can also support businesses, walkability and revitalization. "	Margaret Moore
Preserve historic neighborhood scale. The historic district's historic significance includes not just individual houses, but its modest building scale, setbacks, yards, landscaped parkways, streetscape and open space. Consider fire safety and emergency access. Evaluate increased building mass and reduced setbacks in conjunction with Mid-City's narrow streets, canyon areas, evacuation constraints and firefighters' need for access around structures. No density at the entrance of the district which is in a Very High Fire Hazard Severity Zone.	Alice Zoehrer
Preserve historic neighborhood scale. The historic district's historic significance includes not just individual houses, but its modest building scale, setbacks, yards, landscaped parkways, streetscape and open space. Consider fire safety and emergency access. Evaluate increased building mass and reduced setbacks in conjunction with Mid-City's narrow streets, canyon areas, evacuation constraints and firefighters' need for access around structures. No density at the entrance of the district which is in a Very High Fire Hazard Severity Zone.	Samuel Zoehrer

Consulting Advice	David Thomas Parry
Construction Consulting	David Thomas Parry
Direct greater density to commercial corridors. Concentrate new mixed-use housing along El Cajon Boulevard and other appropriate commercial/transit corridors, where additional housing can also support businesses, walkability and revitalization.	Michael Madsen
Review Figure 1-2 for equitable distribution. Explain why the draft places a notable concentration of Townhome-designated areas in Talmadge, including within the historic district, while Townhome designations appear more limited elsewhere in Mid-City. Remove the proposed Townhome designation from within the National Register-listed Talmadge Park Estates Historic District.	Michael Madsen
Our historic neighborhoods are already overcrowded with a fragile infrastructure, lack of green spaces, and limited parking accommodations. Doubling housing units will only exacerbate this more and take away the unique charm of these neighborhoods that draw families to live here. San Diego can not and will not ever be a San Francisco or Los Angeles. We don't need to accommodate every individual who wants to live here. More housing does not equal 'affordable' housing in San Diego. Rents keep rising as more 'luxury' buildings come up. Developers are the real winners in this city. Not hard-working residents. If you ban short term (Airbnb) units, I'm sure then you'll see prices go down! Enough is enough with overbuilding and ruining the real charm of San Diego's historic neighborhoods.	Shelley Jaccard
Adding density to Talmadge via multi-story apartments will only exacerbate our parking problems which contribute to lack of curbside space for the multiple trash cans each residence now puts out each trash day. We already have overflow parking from the current apartments in 4400 block of our neighborhood. More apartments will send those car owners deeper into the neighborhood looking for parking which will perpetuate the problem. Since these proposed new apartment buildings cannot use City curbside trash pickup, additional trash haulers will need to be contracted which will increase the heavy machinery traffic on streets that cannot currently support heavy vehicles. The infrastructure cannot handle the stress these additional vehicles will create. Not to mention the additional traffic and noise. The 4600 block of 49th St has experienced this increase in residential parking just with the addition of a four plex and junior ADU on one property. When this property was a single family home, the owner use the driveway. Now we have thirteen additional vehicles on the street as no additional parking was provided. The state law that requires twenty feet clearance at intersections eliminates approximately four cars per block. This is just one block that has been negatively impacted by a relatively small amount of infill. The impact of the proposed infill possibilities is incomprehensible.	CM Seabloom

Talmadge has been without a park for its 100 year existence. A park has been promised for decades. When a lot became available in the 1990s at Altadena and Madison, the City said it didn't know it was available. Now we have property available at the charter school on Estrella Avenue between Monroe and El Cajon Blvd. Even more centrally located for our neighborhood. The tiny "parks" identified in this plan are useless. Kids can't play, neighbors can't gather in spaces about the size of a driveway. If these areas were designated as supplemental to an existing park in the neighborhood, then maybe. A parklet with a bench is not a substitute for a playground, picnic tables and a community gathering area which this neighborhood absolutely needs. Walkable communities are the buzzword. Talmadge residents must drive to attend neighborhood meetings. The assessment district meetings are held at a mortuary on El Cajon Blvd! We have to drive there. If the community update proposed and its inherent infill occur even to a small degree, don't these residents deserve a park?	CM Seabloom
This upzone mess is being sold as a salve for affordable housing. The "economic prosperity" component is never explained, but based on plans, seems to center around a definition that means profit for commercial landlords who get to decimate what is unique about our neighborhood in order to put more luxury high rises, office space, and chain retail. Further, there is zero mechanism in place for insuring the public is protected from traffic and parking overload, overcrowding, public infrastructure, and fire safety. Approving plans that ram high rises through first, and then the necessary public safety is an afterthought, though it's admitted that the city has no money for it. So we are all S.O.L. And who designated Kensington as a "mass transit" area? We have two bus stops and one bus route which they are already cutting back on. It's a flimsy justification for destroying our neighborhood.	Kimberly Coffin
You have to take the historic identity of Kensington as a whole. You cannot individually piecemeal specific houses or one church building to preserve as is, and then surround those individual structures with high rises, condos, dense apartments, and chain retail. A historic house next to a McDonalds loses the historic stature and degrades. The whole neighborhood is historic. That Durant mean there is no room for some projects, but this plan is the opposite. It leaves only some single family homes in tact and surrounds them with bland commercial construction and shoddy ADUs packed to the gills. The historic nature of the neighborhood is a whole attribute. Not just a feature of a few individual structures removed from the context of the whole.	Kimberly Coffin

There is absolutely nothing sustainable about destroying the neighborhood for high density housing and commercial buildings. You are creating a fire trap and it has already been acknowledged that the city has no money to ameliorate the lack of infrastructure and overcrowding and safety problems that will come with it. We were told that these fat cat developers and landlords will probably be incentivized to provide these things on their own, but evidence is to the contrary. As we sit, Marlborough Arms just got rid of all their parking spaces for their current residents, and those spaces will now be ADUs. So current residents are losing their parking, new residents are being added who also have no parking. The city is shrugging about this and there is no mechanism to guarantee protections for community if these developers and commercial landlords don't want to voluntarily create it themselves.	Kimberly Coffin
Kensington is a village. It's a neighborhood. It's in the city limits, but what makes it die island is that it's not a Hillcrest either massive commercial structures. Single families live here. Where are we supposed to go? Ramona?	Kimberly Coffin
I know it would be convenient to city planning department if every last resident of Kensington was an able bodied single 30 year old adult who biked to a mass transit station to commute, and that seems to be what the plans assume. But Kensington is a community of a lot of families with kids and older people. Little kids walking to school. The sidewalks and roads could use some safety improvement, but the proposed plans will worsen mobility. The traffic situation will create a lot more dangers for these people. It seems the city wants these groups to be pushed out as residents and replaced with 30-year-old urban professionals who commute to office jobs via mass transit that we do t have here and never will.	Kimberly Coffin
Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	LYNN PALMER
1. The sidewalks should be widened over time to create a more active streetscape that can be used more effectively. While wide in some parts, streets like Adams, parts of El Cajon, 30th, etc. continue to have very crowded sidewalks where it is difficult to walk with other people. If we don't have parks in these neighborhoods, we ought to at least have pleasant public sidewalks where people can relax, enjoy a walk, and participate in public life. Ideally, these sidewalks are interspersed with pocket parks and benches.	Nigel Doering
2. I am not sure if this belongs in this element, but El Cajon is such a wide road and it seems like it should be studied in order to reduce the width, such as removing a car lane to make space for larger sidewalks and bike lanes. With the addition of a dedicated bus lane and an actually safe bike lane, there would most likely be fewer cars utilizing this road as it is.	Nigel Doering

3. Again, not sure if this belongs here, but the noise and particulate pollution of the freeways is most likely poisoning most residents in this area. This should be taken seriously. Have there been any scientific studies looking at the effect of living in these neighborhoods boxed in by freeways? Can we mitigate the noise and pollution so that we aren't all breathing in toxic fumes? Ideally, we get rid of the freeways, but people would lose their minds, unfortunately.	Nigel Doering
1. The class III bike lane on Adams avenue needs to be a true class IV lane. Sharing the road with cars, even with class III is simply not safe and will not truly activate the corridor for mass bike transit without physical separation from vehicles. This is a primary road with heavy car traffic. It is not at all uncommon to see cars speed down this road. Kids, elderly folks, or really anyone who isn't an avid cyclist is not likely to feel comfortable using a class III bike lane here, thus defeating the purpose of the upgrade.	Nigel Doering
2. It makes zero sense to me why you would have a bus-bike lane on el cajon. Are we trying to make public transit as slow as a bike going uphill? El cajon is such a wide road with ample space to build a class IV bike lane which would actually be used. Go home and ask your elderly parents or young children if they would feel comfortable biking down el cajon with a bus behind them. Would you? This should be class IV.	Nigel Doering
3. The 215 rapid line needs to be made into a true rapid line with 30 minute times between downtown and SDSU. Midcity is fairly well connected and having a very fast connection to downtown would continue to reduce VMT and un-needed car trips.	Nigel Doering
4. I cannot wrap my mind around why the 11 bus going down Adam's ave stops at almost every single block. There are like 10 stops between the 15 and 805. This dramatically slows down this bus route. Stops should be consolidated so that the bus is not picking up one person every 1-2 blocks.	Nigel Doering
Shift all Residential Medium sections bounded between Alder, Adams, Biona, I-15 to Residential Low 2 (5-9 du/ac).	AJ Toriello
Pages of DRAFT PLAN are incomplete. Portions of the right column are cut off.	AJ Toriello
Prohibit 6- and 8-story multi-family apartment buildings from historical districts of Kensington and Talmadge. Density of these neighborhoods is already too high.	AJ Toriello
I'm a Talmadge resident and live in a 1937 home. I support adding housing in Mid-City, but not 6-story buildings inside established single-family and historic neighborhoods.	Jordan Gilbert
The "Transitions" section (p. 14) says density should step down from villages and corridors into surrounding neighborhoods. Please make sure Figure 2-1 actually does this. Historic residential areas like Talmadge, Kensington and Islenair should stay in the Low designations. The Medium 3–4, High 1–2 and higher Community Commercial designations (56–218 homes per acre) should be limited to the major corridors. Where a corridor parcel backs directly onto a historic block, it should step down in height at the rear so it doesn't loom over single-family yards.	Jordan Gilbert

Policy 2.4 promises new homes "consistent with the intended neighborhood development pattern," and Policy 2.6 encourages preserving historically significant homes. The land use map should honor both. Density in historic neighborhoods should come from companion units (Policy 2.7) such as garage conversions and small ADUs that fit the neighborhood's scale, not from rezoning to apartment buildings.	Jordan Gilbert
Table 2-1 plans for 42,000 additional homes. Please show residents how much of that capacity the corridors alone can hold. I expect most of it can be met there without upzoning historic neighborhoods.	Jordan Gilbert
I'm a Talmadge resident and live in a 1937 Spanish-style home. I don't support new 6-story buildings inside established neighborhoods, and I want Mid-City's historic neighborhoods preserved.	Jordan Gilbert
Talmadge is one of the plan's own examples of a 1920s "residence park," with curving streets, landscaped entrances and single-family homes with garages (p. 42). It already contains the Talmadge Park Estates National Register district and the Talmadge Gates local district, and the survey identified Talmadge Park as a new potential district (pp. 47–48).	Jordan Gilbert
Please prioritize formally designating Talmadge Park as a local historic district, and list the National Register district locally as Policy 3.7 calls for. Do this before any upzoning takes effect nearby. National Register listing alone offers little local protection.	Jordan Gilbert
Where new housing is added near historic homes, it should be gentle: garage-conversion ADUs and small add-ons that match neighborhood scale. Taller buildings should stay on the major commercial corridors like El Cajon Boulevard, with step-downs where they back onto historic blocks. New construction in or next to historic districts should follow objective design standards based on the Secretary of the Interior's Standards (HP-A.5).	Jordan Gilbert
The plan's vision promises to preserve historic neighborhoods. The land use map should reflect that.	Jordan Gilbert

I'm here to talk about a reality every resident knows well: Kensington is a unique peninsula surrounded by canyons, with only a few limited ways in and out. While I understand the regional push for added housing, we cannot ignore the critical issue of emergency evacuation and everyday safety. In a wildfire or urgent evacuation scenario, thousands of residents—along with neighboring communities—will be funneling onto the same narrow streets and choke points trying to reach a major highway via Adams Ave. Adding significantly more housing without first upgrading our infrastructure and establishing clear, tested disaster evacuation routes isn't just risky, it puts lives in danger. High-density growth cannot come at the expense of public safety. Our community members of all ages deserve a guaranteed path to safety. Before approving density increases, I urge the city to mandate comprehensive safety modeling and procedures to ensure our emergency infrastructure can actually handle the population we already have, let alone thousands of new folks. We love our neighbors and neighborhood. I kindly ask you to open your heart and consider how important this issue really is. Thank you for your time and for prioritizing resident safety.	Jennifer Bourquin
I am supportive of the increased density in the Kensington-Talmadge area, where I live. Especially I like the gradation from highest density around El Cajon blvd, and the Residential medium 4 density between Monroe and El Cajon blvd. I like that this could allow for shops in addition to higher density, as this will dramatically help walkability. Many times I wished to be able to have a corner store etc., closer, as walking on Cajon does not feel very safe many times of day. The more people that are living and walking in the area the safer it will it become. I am appreciative that the increases in the number of properties and units will help make this area maintain affordability. I am also especially appreciative of options that incentivize townhomes or rowhouses, not just apartments, because many people in my generation would like to eventually purchase, not just rent, and townhomes etc., offer a better investment opportunity than condos. Often I know that renters voices like myself are outnumbered by people who have been able to have an economic foothold in the area for long time. Thank you for considering other voices which may be less organized, but are no less important and represent the future economy of the area.	Madeline Tyson

"The Class 3 bike lines on Adams avenue, Monroe and Euclid are insufficient. We need real protection. Shareways are not going to be enough. They are too scary for people who are not already confident and competent bikers. Also, starting at the intersection of Euclid and Monroe, (which is a total pedestrian nightmare that regularly stresses out everyone in the neighborhood) I don't understand why a class 1 bikeway is being prioritized on Aldine over real solutions on Monroe and Adams. Monroe can connect to Mead. Many people use this path to get to 1. The YMCA from Talmadge as well as Franklin Elementary school. Right now the only semi-safe way is on the sidwalk ,and this causes conflicts with pedestrians and trash cans. If there was an actual safe bikeway on Monroe, many more people would bike to school, decreasing the terrible situation with school drop offs and pickups. The path down and up Aldine, might be nice and scenic, but it involves crossing on and off ramps from the hig way, and needlessly going down and up enormous hills that will ONLY benefit people with electric bikes, and still does not solve our problem at Euclid and Monroe, or provide safe transit to connect these neighborhoods in a way that people will actually use. I am a very confident biker, and I will not go on bikeways that cause myself to have to cross on-ramps to the highway, such as Aldine would be. This was exactly how my dad was killed because people on roads like that drive to fast and aren't thinking about bikers.	Madeline Tyson
Also, the 215 needs to be properly rapid so that we can use it as a way to get to downtown and also connect to the trolley system without taking 5x longer than it would take otherwise. "	Madeline Tyson
"On Monday, September 14, 2026, Governor Gavin Newsom signed AB 2576 into law! AB 2576 amends SB 79 to provide protection to Contributors within State/National historic districts like Talmadge Park Estates Historic District (TPEHD). If the State of California is going to protect TPEHD, the City of San Diego should protect us too and not upzone to townhomes 5 blocks within the historic district. TPEHD begins at Monroe Ave, from 44th Street to 49th Street. The City of San Diego says it wants to protect historic resources. Please honor your word."	LAURA HENSON

"The City Has a Legal Obligation to Honor Fire Safety Codes Before Increasing Density This is more than a zoning disagreement. The City has a legal obligation to comply with its adopted fire-safety requirements and to consider public safety when making land-use decisions that could increase the number of people and vehicles dependent upon an already constrained roadway system. The City of San Diego has adopted the 2025 California Fire Code as the San Diego Fire Code. San Diego Fire-Rescue's own fire-access policy states that fire apparatus access roadways must generally provide at least 20 feet of unobstructed width. While older, legally existing roadway conditions may receive special consideration, the City's policy makes the ability to conduct firefighting operations the primary consideration. That distinction matters. Grandfathering an existing narrow street is one thing. Planning for additional development intensity on that same constrained street is another.	LAURA HENSON

... (Continued) The issue before the City is not whether existing residents should lose parking or whether an established neighborhood should be retrofitted to accommodate additional density. The issue is whether the City should purposely increase allowable density immediately outside a Very High Fire Hazard Severity Zone when those same constrained streets may be needed simultaneously for evacuation and incoming emergency apparatus. Increasing allowable density could add residents, vehicles and evacuation demand to this critical gateway. The City's obligation to protect public safety should apply both to the people who already live in the affected communities and to the future residents the proposed zoning is intended to accommodate. There is no need to create this additional risk in order to accommodate housing growth. El Cajon Boulevard and other appropriately sized, underdeveloped commercial corridors provide opportunities for additional housing and mixed-use development without intentionally adding residential intensity at a constrained gateway serving Very High Fire Hazard Severity Zones. The City should therefore retain the existing residential zoning in this location and direct proposed additional housing capacity to areas where adequate emergency access and evacuation can be accommodated without disregarding the City's own Fire Access Roadway policies (FPB Policy A-14-1). This is not an argument against housing. It is a statement that new housing should be planned for and built where it can be accommodated safely. Public safety should be addressed before the City authorizes additional development intensity—not after the additional density has been approved and the risk has been exacerbated. "	LAURA HENSON

Talmadge the section on Monroe from 44th - Highland has been designated as Residential Medium (45-54). This area is 1) Located in a Very High Fire Zone 2) Monroe is very narrow in this area resulting in restriction evacuation capabilities 3) This area is a Historical District (Talmadge Park Estates) 4) Monroe is a City bike route 5) these home have a High Voltage Line that is above the backyard 6) Hoover Highschool Athletic field is along Monroe. All of the above were not considered and need to be considered when designating this section for future land use. Medium (45-54) is not the appropriate designation and was a total miss by the committee. The committee needs to better understand the area, the high fire risks due to the canyons, the recent fires, the layout of the community and other limitations either due to infrastructure or state protection for historical properties.	Angela Finn
Lets make some new plans	Laurie Larabee Baker
Take care of our parks	Laurie Larabee Baker
Increased density must be avoided in the Very Severe High Fire Zone.	William Behun
There are better places to accommodate additional housing. El Cajon Boulevard remains substantially underdeveloped and provides opportunities for new housing and mixed-use development without unnecessarily increasing density at a constrained entrance to a Very High Fire Hazard Severity Zone or within our National Register Historic District.	William Behun
Also - at the latest Ken-Tal meeting (9-21-26) where city planning presented the city proposed zoning map - the upzoning map proposed by Dan is much more sensitive to the community "fabric". More density can be achieved along El Cajon Blvd. transit and utilities corridor and the density tapering down towards the existing Kensington and Talmadge homes. Hopefully Dan's plan can be used versus the present city proposal.	William Behun

"Kensington-Talmadge is completely different from the three other neighborhoods that are lumped together in this Mid-City plan, and therefore we have different needs. Our community has a completely different makeup and we have unrelated interests and socio-economic demographics. But most importantly, we are comprised primarily of historic, but well-maintained, single-family homes, with only a few small apartment complexes here and there south of Adams. My house in South Kensington was built in 1936 and has Craftsman features such as built-in bookcases, arches and curved ceilings, and that's the reason I bought it. In fact, I sunk my savings not only into paying off the mortgage but also to renovate and update the house so that I could afford to retire and die here. I don't oppose growth per se. My primary concern is the placement of this new density. I don't care if you develop busy city streets like El Cajon Boulevard, which clearly could use some gentrification and revamping. The street is in such terrible shape that the potholes damage my suspension every time I drive over them, so I try to avoid doing so. Why can't the density-affected area start at El Cajon Boulevard (rather than Adams Avenue) and head south, where the recent Union-Tribune article said residents believe their community has been long neglected and left to deteriorate, so they welcome new development? A proposed historic district designation for Kensington-Talmadge has already been submitted to the state. I downloaded a copy and I believe it's 625 pages long, so it's quite detailed. My question is, if this plan update passes, would that historic designation nullify the density changes? Or vice versa? Does one supercede the other?"	Caitlin Rother

"I saw a lot of distraught people at the KTCPG meeting, many of them older women who live alone in their homes, their faces fraught with panic, frustration, hopelessness, helplessness, and anger. I saw my own feelings displayed on their faces, as my neighbors and I were left feeling that we in South Kensington don't really matter. That our needs and our homes are not as important as the residents of our wealthier neighbors north of Adams Avenue, which will be unaffected by this plan update. And why is that? I don't see the city proposing changes like this in La Jolla either. My neighbors and I have spent a lot of money to buy and maintain these historic properties because we are proud of and love our neighborhood the way it is, and we want to keep its historic nature intact. That said, this plan could effectively push us out of our homes. But where else can we find smaller, older homes like these? Nowhere. Because you are allowing developers to tear them down. And even if we could, how would we afford the higher property tax payments? I can only hope that you listen to the people of Kensington-Talmadge and move that density and development to El Cajon Boulevard and further south, where the residents actually want it. Or none of us will recognize our beautiful, peaceful community anymore. "	Caitlin Rother

"What the city is proposing is a nightmarish crush of increased density, to fill our charming, intimate historic neighborhood, specifically in my immediate neighborhood of South Kensington, with garrish apartment complexes looming six to eight stories, and three to five times more people living in that space than do today. The plan allowing these new complexes, which would all be squished into the few square blocks surrounding my house, is envisioned to triple the community's overall population and yet developers will not be required to provide any additional parking spaces because they will be built just blocks from a couple of bus routes, even though some of those routes are slated for reduction or elimination. Just take a minute to process that ridiculous lapse of common sense and logic. Parking was already a problem in this neighborhood because teachers and staff at Franklin Elementary School park on the surrounding streets, all of which are flagged for the new density in the plan update. That parking problem worsened after the ADUs started going in. Imagine the impact of multiple towering apartment complexes with no additional parking spaces. There isn't room now, and more people crammed into more units will only cause more chaos. As business owner Stella Stehly so aptly stated at the meeting, "Where do you put all of these cars?" "We don't have a housing shortage, we have a shortage of affordable housing," one KTCPG member pointed out. And as one city planner noted, developers are learning the hard way that they can't rent apartment buildings that provide no parking, so why is the city allowing them to build them that way? I can't believe the city is powerless over this. I just can't. How many of these new buildings are fully occupied? I'd love to see some statistics on their rates of occupancy, because it sounds like this entire plan could be unnecessary overkill.	Caitlin Rother

"A Kensington community fire-safety group leader raised the question whether we even have enough water or pressure to put out fires in this area as it is, noting that 76 homes burned in a fire in Normal Heights in 1985. Another group leader noted that the streets marked for growth are those that are already flagged as fire evacuation routes, so, if a fire should break out, they would be exponentially more clogged than they were during the most recent wildfire. To illustrate the possible consequences, the group put up slides from the Palisades fire of 2025, which burned down 6,738 structures across 37 square miles, and the Paradise fire of 2018, when most of the town, which was built in a forested area but had only one primary road out, went up in flames and left motorists trying to flee stranded. “In Kensington, we take wildfire seriously, because it’s a real risk,” one fire safety leader said, adding that we need to increase infrastructure and fire safety measures along with any planned population growth, and given that our community is surrounded by canyons, a detailed wildfire evacuation analysis should be done before this plan is approved. I completely agree.	Caitlin Rother

Thank you for the opportunity to comment on the Draft Mid-City Communities Plan. I am writing specifically from the perspective of Normal Heights. I support the central idea that our neighborhood should evolve. We need additional housing, safer streets, more trees, more public spaces and greater opportunities for people to live close to the places they work, shop and gather. But I believe the measure of this plan should be larger than how many additional housing units it makes possible. My highest priorities are to make Normal Heights dramatically more walkable and shaded while ensuring that the people who already live here can stay and enjoy those improvements. That means pairing additional housing along Adams Avenue with safer crossings, wider and more comfortable sidewalks, a continuous tree canopy, traffic calming, inviting public spaces and protections for existing affordable and lower-cost housing. The goal should not simply be to fit more people into Normal Heights. It should be to create a neighborhood where more people can continue to live well, and where longtime residents are not priced out of the community they helped create over a century ago. I would encourage the City to use one simple test when evaluating every major recommendation in this plan: Does this change make Normal Heights more walkable, more shaded, more affordable to existing residents, and more connected, while directing the greatest intensity of growth toward Adams Avenue (which is the social backbone of our community and a place where everyone hangs out)? Will we have more places where neighbors naturally encounter one another? And will the public infrastructure needed to support additional residents actually arrive alongside the development? Those questions should become explicit measures of success for Normal Heights	Madeleine Baudoin

1. Make resident stability fundamental measures of success I support creating more housing in Normal Heights, particularly in walkable locations near businesses and bus stops. But housing production alone does not guarantee affordability or neighborhood stability. Normal Heights contains many older apartments, bungalow courts and smaller multifamily properties that provide an important source of relatively attainable housing. As land values rise and redevelopment occurs, some of these properties may become especially vulnerable to replacement. The final plan should therefore include a clear strategy for preserving existing naturally occurring affordable housing while adding new housing. I would like the City to track: Who is still able to live here? The City should establish measurable indicators for displacement, loss of lower-cost rental housing, renter stability, affordable housing production and preservation of existing housing. Growth should create room for new neighbors without unnecessarily pushing out existing ones.	Madeleine Baudoin
2. Treat Adams Avenue as the social heart of Normal Heights: Adams Avenue functions as the neighborhood's social backbone. Our restaurants, coffee shops, post office, pubs, music venues, markets, festivals, sidewalks and locally owned businesses create opportunities for people to repeatedly encounter one another. Those encounters matter. They are how acquaintances become neighbors and how neighborhoods develop trust, identity and social connection. As Adams Avenue is already happening and as it evolves, development standards should deliberately reinforce this function. New development along Adams should incorporate active ground floors, smaller storefronts, frequent entrances, outdoor seating, attractive sidewalks, trees, pedestrian-scaled lighting and places to sit and gather. Large developments should not create long stretches of blank walls or inward-facing spaces that turn away from the street. The goal should be: More neighborhood life on Adams Avenue.	Madeleine Baudoin

3. Connect additional housing capacity to visible public improvements If Normal Heights is going to accommodate substantially more residents over the next several decades, the public realm must grow along with the population. Residents should be able to see a clear relationship: More housing + more trees. More residents + better sidewalks. More development + safer intersections. More density + better transit and more comfortable bus stops. More people + more parks and gathering spaces. Growth becomes much easier for communities to embrace when residents can see tangible improvements in everyday neighborhood life. I encourage the City to create an implementation framework identifying the infrastructure improvements that should accompany anticipated growth in Normal Heights and how those improvements will be funded.	Madeleine Baudoin
4. Continue to make Normal Heights one of San Diego's most walkable neighborhoods Normal Heights has one enormous advantage: many destinations are already close together. But proximity is not the same thing as walkability. People walk to work. They walk to restaurants. People walk to the post office. They walk their kids to school. A neighborhood becomes truly walkable when an eight-year-old, an eighty-year-old or someone using a wheelchair or pushing a stroller can all comfortably move through it. The final plan should prioritize: • safer pedestrian crossings; • shorter crossing distances; • traffic calming; • wider sidewalks where feasible; • pedestrian-scale lighting; • continuous ADA-accessible routes; • protected bicycle infrastructure where appropriate; and • comfortable connections between residential streets, Adams Avenue, schools, parks and community facilities. Particular attention should be given to intersections where neighborhood streets meet Adams Avenue and other high-traffic corridors. The goal should be to make walking the easiest and most pleasant way to make many short trips within Normal Heights.	Madeleine Baudoin

5. Treat shade as essential infrastructure I strongly support the plan's emphasis on urban forestry, but I encourage the City to go further. In a warming climate, shade is no longer merely a beautification feature. Shade is transportation infrastructure. It determines whether a parent walks with a child, whether an older adult walks to a store, whether someone waits comfortably for a bus and whether people choose to spend time outside. The final plan should establish measurable tree-canopy and shade goals for Normal Heights and identify priority pedestrian corridors for implementation. Adams Avenue should eventually become a nearly continuous shaded pedestrian corridor. The City should also prioritize shade along routes to schools, parks, bus stops and community facilities. Where trees cannot provide adequate canopy, the City should consider complementary shade structures.	Madeleine Baudoin
6. Create a network of small public gathering places One of the strongest opportunities in this plan is the possibility of creating additional public spaces and pocket parks. Normal Heights does not necessarily need enormous parks to make a meaningful difference in neighborhood life. A small plaza. A pocket park. A community garden. A shaded seating area. A widened sidewalk with tables and benches. A small public space incorporated into redevelopment. These places may look insignificant on a regional planning map, but socially they can be enormously important. Especially along the Adams Avenue corridor. They create the repeated casual interactions from which community develops. I encourage the City to identify opportunities throughout Normal Heights for a distributed network of small gathering spaces rather than relying exclusively on larger recreation facilities.	Madeleine Baudoin

7. Make the proposed new library a civic gathering place I strongly encourage the City to prioritize a modern library that serves Normal Heights and Kensington as part of the implementation of this plan. A neighborhood library should be thought of as more than a building containing books. It can function as one of the community's most important pieces of social infrastructure, a place shared by children, seniors, families, students, newcomers and longtime residents. If a new library moves forward, I encourage the City to design it as a true community gathering place, incorporating flexible meeting spaces, outdoor areas, shade and opportunities for programming and community events.	Madeleine Baudoin
8. Preserve the fine-grained character that makes Normal Heights work Normal Heights has developed through many different eras. Bungalows sit near bungalow courts. Small apartment buildings coexist with larger multifamily buildings. Businesses of many sizes line Adams Avenue. That mixture contributes to the neighborhood's character and also creates opportunities for people with different incomes and household types to live here. New housing does not have to erase this pattern. The plan should encourage building forms that add homes while maintaining a human-scaled public realm, courtyard housing, bungalow courts, townhomes, small and medium multifamily buildings and mixed-use buildings along commercial corridors. We should avoid creating a false choice between preserving Normal Heights exactly as it is and allowing unlimited redevelopment. The better objective is: Growth that strengthens place.	Madeleine Baudoin

9. Protect the small-business ecosystem The survival of independent businesses deserves more attention as the neighborhood changes. Locally owned restaurants, shops and service businesses do more than provide goods and services. Their owners know residents. Their employees know customers. People encounter neighbors there. They sponsor community events. They become informal neighborhood institutions. As redevelopment occurs along Adams Avenue, the City should explore strategies that preserve smaller commercial spaces and encourage the return of neighborhood-serving businesses to new developments. A neighborhood composed entirely of expensive commercial spaces accessible only to large operators would lose something important even if the buildings themselves were attractive. Economic diversity is part of neighborhood diversity.	Madeleine Baudoin
10. Measure social infrastructure, not simply physical infrastructure Community plans tend to measure things that are easy to count: housing units; road improvements; acres of parks; miles of bicycle lanes. Those things matter. But I encourage the City to think more broadly about what makes communities resilient. Normal Heights also depends upon its schools, recreation areas, community organizations, business organizations, places of worship, nonprofits, festivals and informal gathering places. These institutions create relationships. And relationships create resilient neighborhoods. Implementation of the community plan should therefore include regular engagement with these neighborhood institutions and consideration of how development strengthens—or weakens—the network connecting them.	Madeleine Baudoin

11. Create a Normal Heights implementation scorecard Finally, the community deserves a way to determine whether the promises contained in a thirty-year plan are actually being delivered. I recommend establishing a simple neighborhood-level implementation scorecard reviewed periodically with the community. It could track: preservation of existing lower-cost housing;displacement indicators; tree canopy;pedestrian improvements;traffic injuries;parks and public spaces;bus stop improvements;small business retention;and progress on major community facilities. Every few years we should be able to ask: Are more people able to participate in neighborhood life? Can people of different incomes still live here? Do residents have more places to gather? Are our streets safer? Are we becoming greener and more walkable? Are our neighborhood institutions becoming stronger? If the answer is yes, then the plan is working. A larger vision for Normal Heights Normal Heights does not need to choose between change and preservation. It does not need to choose between new neighbors and longtime neighbors. And it should not have to choose between housing and quality of life. The opportunity presented by this community plan is to grow while becoming more connected. More housing, but also more affordability. More people, but also more public space. More density, but also more trees. More mobility choices, but also safer streets. More development, but also stronger local businesses and institutions. The aspiration should be straightforward: Thirty years from now, Normal Heights should not simply have more buildings and more residents. It should be an even better place to belong.	Madeleine Baudoin

If Normal Heights is going to accommodate substantially more residents over the next several decades, the public realm must grow along with the population. Residents should be able to see a clear relationship: More housing + more trees. More residents + better sidewalks. More development + safer intersections. More density + better transit and more comfortable bus stops. More people + more parks and gathering spaces. As far as economic prosperity goes, growth becomes much easier for communities to embrace when residents can see tangible improvements in everyday neighborhood life. I encourage the City to create an implementation framework identifying the infrastructure improvements that should accompany anticipated growth in Normal Heights and how those improvements will be funded.Protect the small-business ecosystem The survival of independent businesses deserves more attention as the neighborhood changes. Locally owned restaurants, shops and service businesses do more than provide goods and services. Their owners know residents. Their employees know customers. People encounter neighbors there. They sponsor community events. They become informal neighborhood institutions. As redevelopment occurs along Adams Avenue, the City should explore strategies that preserve smaller commercial spaces and encourage the return of neighborhood-serving businesses to new developments. A neighborhood composed entirely of expensive commercial spaces accessible only to large operators would lose something important even if the buildings themselves were attractive. Economic diversity is part of neighborhood diversity.	Madeleine Baudoin

"In Normal Heights I encourage the city to measure social infrastructure, not simply physical infrastructure. Community plans tend to measure things that are easy to count: housing units; road improvements; acres of parks; miles of bicycle lanes. Those things matter. But I encourage the City to think more broadly about what makes communities resilient. Normal Heights also depends upon its schools, grocery store, recreation areas, community organizations, business organizations, places of worship, nonprofits, festivals and informal gathering places. These institutions create relationships. And relationships create resilient neighborhoods. Implementation of the community plan should therefore include regular engagement with these neighborhood institutions and consideration of how development strengthens, or weakens, the network that is already established and working beautifully well. "	Madeleine Baudoin
"I strongly support the plan's emphasis on urban forestry, but I encourage the City to go further. In San Diego, shade is not only a beautification feature. Shade is transportation infrastructure. It determines whether a parent walks with a child, whether an older adult walks to a store, whether someone waits comfortably for a bus and whether people choose to spend time outside. The final plan should establish measurable tree-canopy and shade goals for Normal Heights and identify priority pedestrian corridors for implementation. Adams Avenue should eventually become a nearly continuous shaded pedestrian corridor. The City should also prioritize shade along routes to schools, parks, bus stops and community facilities. Where trees cannot provide adequate canopy, the City should consider complementary shade structures.	Madeleine Baudoin
"I would encourage the City to use one simple test when evaluating every urban design element in the plan: Does this change make Normal Heights more walkable, more shaded, more affordable to existing residents, and more connected, while directing the greatest intensity of growth toward Adams Avenue (which is the social backbone of our community and a place where everyone hangs out)? Will we have more places where neighbors naturally encounter one another? And will the public infrastructure needed to support additional residents actually arrive alongside the development? Those questions should become explicit measures of success for Normal Heights.	Madeleine Baudoin

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"Treat shade as essential infrastructure I strongly support the plan's emphasis on forestry, but I encourage the City to go further. In a warming climate, shade is no longer merely a beautification feature. Shade is transportation infrastructure. It determines whether a parent walks with a child, whether an older adult walks to a store, whether someone waits comfortably for a bus and whether people choose to spend time outside. The final plan should establish measurable tree-canopy and shade goals for Normal Heights and identify priority pedestrian corridors for implementation. Adams Avenue should eventually become a nearly continuous shaded pedestrian corridor. The City should also prioritize shade along routes to schools, parks, bus stops and community facilities. Where trees cannot provide adequate canopy, the City should consider complementary shade structures. "	Madeleine Baudoin
the kensington area has only 2 roads for evacuation so if we add more housing people will not be able to evacuate in case of fire. Its also surrounded by canyon which is a high fire hazard.	Lisa Stone

I am an individual resident and property owner in Kensington (4520 Copeland Ave, San Diego, CA 92116), not writing on behalf of any organization. Our neighborhood planning group, the Kensington-Talmadge Planning Group, put together its own plan for meeting the state's new transit-density law (SB79) in a way that avoids rezoning single-family blocks. They submitted it to the City twice, in May 2026 and again in July 2026. As far as I can tell, the City's draft plan doesn't mention SB79 anywhere, and doesn't mention the planning group's alternative either. As an example: my property, on the block bounded by Monroe Avenue and Madison Avenue, is zoned Residential Medium-2 in the draft. The next block north, between Madison Avenue and Adams Avenue, already has commercial businesses fronting Adams Avenue and is zoned Residential Medium-3 -- that part I understand, since it matches what's already there. But my own block, on the other side of Madison Avenue from that commercial frontage, is still zoned Medium-2 rather than the Residential Low-2 that covers most of the rest of Kensington. My block is also well removed from El Cajon Boulevard, which is where the transit stop driving the state density requirement is located, so that requirement doesn't appear to explain it either. I'm asking the City to rezone the strip of blocks between Monroe Avenue and Madison Avenue, to Residential Low-2, matching the transition already used elsewhere in Kensington, and to treat this part of the neighborhood as being just as historic as the area on the other side of Adams Avenue.	Duane Short
I am an individual resident and property owner in Kensington, not writing on behalf of any organization. In 2025, the City's own historic preservation survey found that parts of Kensington could qualify as new historic districts -- the survey calls them "Kensington Manor and Heights" and "Kensington Park." But the draft plan doesn't actually commit to protecting these areas. It only says the City will "encourage" and "support" preservation, with no firm deadline or promise attached. And the map showing where new, denser zoning would go doesn't appear to take these historic district boundaries into account at all. Before the City increases allowed density in Kensington, I am asking that it: 1) show the public exactly where these two potential historic districts would be, so residents can compare that to the proposed zoning map; 2) set a real deadline for deciding whether to officially designate them as historic districts; and 3) not increase zoning density in either area until that decision has been made.	Duane Short
I am an individual resident and property owner in Kensington. The draft plan calls out specific corridor segments in Mid-City for special design attention, including a written promise to step building heights down near single-family homes along El Cajon Boulevard near the College Area, and a similar promise for Adams Avenue. But the plan does not include any similar design guidance for the stretch of El Cajon Boulevard that runs directly through Kensington-Talmadge, even though that stretch includes some of the highest density levels on the entire map, immediately next to established single-family neighborhoods. I'm asking the City to add the same kind of height step-down and transition commitment for the Kensington-Talmadge portion of El Cajon Boulevard that it has already promised for other parts of Mid-City.	Duane Short

I am an individual resident and property owner in Kensington. The City's own park inventory for this plan shows that Kensington-Talmadge is not getting a single Major Park, Community Park, Recreation Center, or Aquatic Complex anywhere in this 30-year plan, even as the neighborhood is asked to absorb significant new housing density. Nearly all of the "planned" park improvements listed for Kensington-Talmadge are small pocket parks under half an acre each, plus a hillside walking trail that sits on privately owned land the City does not yet have permission to use. By comparison, other Mid-City communities covered by this same plan are getting large new community parks, recreation centers, and aquatic complexes. On top of this, the fees new development pays toward parks go into one citywide account rather than being set aside for the community where the growth is happening, so there is no guarantee that new density here translates into new park investment here. I'm asking the City to commit to real, funded park and recreation improvements for Kensington-Talmadge that match the density increases being proposed, or to reduce the density increases.	Duane Short
"The plans to not have built in parking, enough traffic patterns to go through the solitary stoplight in kensignton, and its historic nature must be preserved. my dad, who owns the empty lot next to 4005 Wesleyan place. City Council has buried in the plan they want to make a walking trail down the hill to mission gorge. So random people and homeless would set up encampments on that hill below, and be walking in from the back of the neighborhood, leading to more crime and fire risk. Plus they could walk up through the protected bike path."	Brittany Catton kirk
My comments concern the interaction among three sections of this plan: Chapter 2's Development Potential, Chapter 4's Fire policies—particularly Policies 4.17 and 4.19—and Chapter 6's Mobility policies. The plan contemplates capacity for approximately 42,000 additional homes and 89,000 additional residents, while Policy 4.17 requires safe and efficient evacuation during fire emergencies. I do not see in the Community Plan a quantitative demonstration that the future street network can evacuate that substantially larger population from canyon-adjacent Very High Fire Hazard Severity Zone neighborhoods, particularly as some streets are also redesigned for traffic calming, bicycle and transit improvements. Where is that analysis, and what development thresholds require transportation or fire-safety improvements before additional density occurs? They should be identified and referenced within the document.	Jacqueline Todd

"- Policy 4.17 — periodic emergency planning and coordinated operations to ensure “safe and efficient evacuations” during fire emergencies. - Policy 4.19 — adequate water supply, flow rate and duration, along with hydrant readiness. - Also mention Policy 4.16 on brush management and 4.18 on Fire Safe Councils. These policies need to be evaluated against the much larger population authorized elsewhere in the plan. Add or address the following items relative to public safety: 1. Quantitative wildfire evacuation study using full/near-full buildout, Santa Ana conditions and realistic vehicle-occupancy assumptions. 2. Evacuation-route and choke-point maps, particularly for canyon-edge neighborhoods. 3. Fire-response modeling at future population, demonstrating compliance with adopted response-time objectives. 4. Development triggers establishing when another engine, crew, station, hydrant/water-system improvement or other fire resource must be operational. 5. Water-system/fire-flow analysis under major-fire conditions rather than a general policy commitment. 6. Emergency-access review of Complete Streets projects, including traffic calming, bicycle separation and transit-lane conversions. 7. Future vehicle-trip/VMT assumptions disclosed clearly, including how much mode shift is being assumed from approximately 89,000 additional residents. 8. Cumulative analysis, including incoming workers and travel from neighboring communities rather than treating Mid-City residents as the only source of traffic.	Jacqueline Todd

...(Continued) 9. Monitoring thresholds so the City must reassess evacuation, fire response and transportation capacity as actual development approaches specified levels. 10. A clear distinction between improvements that are funded/programmed and improvements that are merely aspirational. Policy 4.17 says the City should continue emergency planning and coordinated operations to ensure safe and efficient evacuation, including provisions for car-free households. That is a useful policy, but it does not answer the land-use question created by substantially increasing the number of people who may someday need to evacuate simultaneously. In the draft itself, I did not find a quantitative wildfire-evacuation analysis showing things such as: - estimated evacuation clearance times at existing versus future population; - canyon-neighborhood evacuation bottlenecks; - the number and capacity of ingress/egress routes; - intersections likely to fail or gridlock during a simultaneous evacuation; - effects of parked vehicles, road closures or emergency apparatus operating against outbound traffic; - scenarios involving Santa Ana winds, nighttime fire, power loss or communications failure; - phased evacuation assumptions; - treatment of elderly, disabled, transit-dependent and car-free residents; - simultaneous evacuation from adjoining communities; or - triggers limiting additional development if evacuation performance becomes unacceptable. That is materially different from saying that agencies will coordinate evacuations. Is this addressed in detail in other City Planning documents? It should be specifically identified and referenced. At the proposed population and density, do the affected canyon-edge neighborhoods continue to satisfy the City's adopted response standards, and if not, at what development threshold are additional resources required? Which water zones serving the VHFHSZ areas have been tested under simultaneous structural/wildland-fire demand? What are the residual pressures? Is there redundancy if electrical power is interrupted? Are any canyon-rim neighborhoods dependent on vulnerable pumping infrastructure?"	Jacqueline Todd

"How much of the additional travel generated by 89,000 potential additional residents is actually assumed to shift to walking, biking and transit—and what empirical assumptions support that percentage? That calculation should be visible. California transportation analysis has changed substantially under SB 743. VMT, rather than conventional roadway Level of Service alone, is generally the principal CEQA transportation metric; automobile delay by itself ordinarily is not treated as a significant environmental effect. But that does not mean congestion, road capacity or emergency access cease to matter operationally. Emergency access remains a separate transportation/public-safety question. That distinction is particularly important here. Road reallocation deserves an evacuation overlay The draft proposes or contemplates: - traffic calming; - separated bicycle infrastructure; - bus-bike lanes; - dedicated or priority transit lanes; - changed street classifications; - pedestrian improvements; - signal priority; and - modified curb/parking management. These improvements may produce substantial safety and mobility benefits in ordinary daily conditions. But the plan should demonstrate that roadway redesign does not unintentionally reduce emergency evacuation throughput or emergency-apparatus access in the portions of the street network serving canyon neighborhoods. The City's assessment and documented analysis should overlay three maps: future density + VHFHSZ/canyon areas + evacuation/emergency-access road network."	Jacqueline Todd

My name is Neil Winner, and I'm Chair of the Kensington Talmadge Planning Group. However, I'm writing these comments on my own, personal behalf. First, I want to state that I am not against all increased development in Kensington-Talmadge. I support increased density and development where it is appropriate in SCOPE, LOCATION, CHARACTER, and SCALE. The Mid-City Communities plan needs to work for ALL of Kensington-Talmadge. It is critical that we get this plan update done right. In July, the Kensington Talmadge Planning Group (KTPG) worked hard to develop, vote on, and submit to the City an SB79 ALTERNATIVE Development Plan, which also is posted on the KTPG Website. We truly thought and believed the SB79 plan submitted by our Planning Group was an appropriate plan. If that alternative plan needs to be modified, the KTPG would welcome the opportunity to work with the City Planning Department to do so. The City has proposed a draft mid-city plan which does not include suggestions made by the KTPG. I believe there are serious issues with the draft plan. The current City plan increases density while making no commitments for funding amenities and infrastructure. The location and nature of the density increases proposed are not compatible with infrastructure, fire safety, and the historic nature of our community. A very significant issue for me is the failure of the draft plan to mention or include all the ALREADY EXISTING AND APPLICABLE CITY BONUS DEVELOPMENT PROGRAMS. These include Bonus ADUs, Sustainable Development Areas, Transit Priority Areas, and Complete Communities Housing Solutions, etc. The Bonus ADU Program, for example, ALREADY allows up to 6 dwelling units depending on lot size for most single-family lots. The combined effect of layering these programs on one another is not shown or considered in the draft City Plan. The Complete Communities program is particularly egregious in that it allows an extra 33 feet in height where zoning is for 20 du/ac or more. This would apply to all the proposed land use categories above Residential Low 3 in the draft City Plan.	Neil Winner

... (Continued) Instead of what is shown in Figure 2-1 Planned Land Uses on page 13 and depicted in the Land Use Designations pictures on pages 16 to 20 in the draft plan, the 2-story attached duplexes that are pictured can be 4-story, the 3-story attached townhomes, rowhomes, attached flats, and multi-family buildings can be 6-story, and 5-story multi-family buildings can be 8-story apartment buildings. Therefore, with these already existing bonus programs, much of the proposed zoning would ACTUALLY allow for: • 6-STORY TO 8-STORY MULTI-FAMILY APARTMENT BUILDINGS • IN KENSINGTON – FROM 1 BLOCK NORTH OF ADAMS SOUTH TO EL CAJON BLVD • IN TALMADGE – FROM MADISON SOUTH TO EL CAJON BLVD We want to avoid a repeat of what happened with the City's Bonus ADU Program. That program had to be severely cut back after the abusive over-development that occurred beyond what was envisioned or desired. My question to the City Planning Department is: How will you prevent the unintended consequences of developers and builders using Complete Communities and the other existing bonus programs to exploit and exceed what the draft plan proposes and shows in Figure 2-1? Other specific issues with the City's Mid-City Communities Plan include: • Legally enforceable up-zoning is paired with only an aspirational discussion of new infrastructure and amenities, as opposed to what was done in the 1998 plan. (Phrasing such as ""encourage"", ""support"", ""can"", instead of "will" or "shall"). • The proposed SB79 (State mandated transit-oriented development upzoning) Alternative Plan submitted by the Kensington-Talmadge Planning Group was not mentioned or incorporated into the draft plan. Our Alternative Plan complies with SB79, yet limits the impact to single-family homes. • The boundaries of existing and proposed historical districts were not included, nor were they respected in the City's zoning decisions.	Neil Winner

... (Continued) There is no fire emergency evacuation plan in the draft plan and increased development is proposed in areas adjacent to Very High Fire Hazard Severity Zones. Emergency evacuation and response that would have to occur through these areas with increased development would be difficult if not impossible. •Significant expansion of parks, schools and other public facilities occurred in other Mid-City communities, but not in Kensington-Talmadge. •Zoning/Amenity funding mismatch: density increased substantially without matching increases in public-facility funding. •Many of the proposed parks are not viable for various reasons, including private land, topography, and easements. •The plan does not break out data by Community Planning Group (CPG) which masks the deficiencies that exist in Kensington-Talmadge. •The commercial zone on Euclid Avenue was not extended to Monroe Avenue as proposed by the Kensington-Talmadge Planning Group. •Nothing was included in the draft plan regarding Aldine Drive and the intersection of Monroe Avenue and Euclid Avenue. "	Neil Winner
"I would like a class IV bike lane on Adams Ave, meaning physically separated from cars with barriers in between.	Udayan Tandon
In addition I would also like to see a class IV bike lane on El Cajon Blvd. Right now bicycles and buses share the same lane which makes it very unsafe."	Udayan Tandon
I would like to see an increase in the bus rapid transit routes going through mid-city.	Udayan Tandon

"My name is Kelly. My family has lived in Kensington-Talmadge for 14 years. My kids attend a local public school. We have been active in the school, including PTA, and we're involved in Girl Scouts and youth basketball. My spouse is a past member of the Ken-Tal Business Association. We are renters, because this is the only way we can afford to afford to stay in our home community. I support this plan, and I support density throughout our neighborhood, including on my own block. I want to address the claim by certain adversaries that this plan takes aim at ""single-family neighborhoods."" That phrase is doing a lot of work. It's a zoning category, and it's being used as a stand-in for families. But I am part of one of these families, and so are my neighbors in the apartments and duplexes around us. When the phrase is invoked to block new homes, it doesn't protect families like mine. It protects a status quo that most families can't afford to join. I agree that parks, libraries, and transit must be binding commitments, and I support that. But infrastructure concerns can't be a reason to stop housing, especially when the same voices raising them oppose the housing itself. Many long-time owners here benefit from California's property tax rules, paying on monetary values set decades ago, while renters carry the full weight of a market built for scarcity. It's hard to call that neighborhood protection, when the cost falls on the people who are trying to stay. Every year, families from my kids' classes leave San Diego. That is the real loss of neighborhood character. The old San Diego is not coming back, and the question is whether our kids get a place in the new one. Approve this plan. Thank you."	Kelly
I support this plan and the transit-oriented density along El Cajon Boulevard and near the future Purple Line stations. Homes near transit let families get around without needing a second car. I also ask that transit, walking, and biking improvements be binding commitments ("will" and "shall," not "encourage"), so that new housing and mobility investment arrive together.	Kelly
I support this plan and want parks, libraries, and public facilities to be binding commitments ("will" and "shall," not "encourage"). Growth should come with investment, and families like mine, renters who have lived in Kensington-Talmadge for many years, and new neighbors joining our thriving community, are counting on it.	Kelly

Kensington remains one of San Diego's most intact collections of single-family homes built using Spanish Colonial Revival architectural design elements from the Panama-California Exposition of 1915-17 in Balboa Park. These homes deserve to be 'hands off' from any plans that seek to create density by demolition of the present inventory.	Ken Baer
Wildfire danger impacts all of us. Our topography is a series of canyons and mesas, and as a result, Kensington is just as connected to Mission Valley as it is to City Heights. Until a properly vetted emergency evacuation plan is developed by the City of San Diego's fire department in partnership with Traffic Engineering, it is 1000% irresponsible for the City to plan for any additional growth in Mid City neighborhoods.	Ken Baer
You state: "Since the 1998 community plan, Mid-City has seen significant expansion of parks, schools and other public facilities." There has been no expansion of parks, schools and other public facilities in Kensington. You then say, "Mid-City saw rapid growth between 1980 and 2000, adding approximately 47,900 people. A large infusion of immigrant communities to Mid-City occurred during this time. Consequently, the rapid population growth outpaced home building and the delivery of community facilities, including schools, libraries, parks, and infrastructure." That contradicts your previous statement.	Maggie McCann
The plan does not reflect the survey and submission of a proposed Kensington National Historic District. As part of the process for submission, a copy of the submission was supplied to the city in time for its inclusion in this plan. While it has not yet completed the designation process, it does exist and should be reflected in this plan. Everything north of Monroe Avenue in Kensington should be off the table for increased density as the entire area has an intact collection of single-family houses that maintain good integrity. Currently, over 105 houses in Kensington are historically designated, and the majority of the remainder have been identified as Contributors to the historic district.	Maggie McCann
Re: Wildfire Planning "d. Provide and maintain water supply systems to supplies for fire suppression. e. Provide adequate fire protection. (see also PF-D.1 and PF-D.2)" A plan without funding is just paper. The DIF for mid-city was never adjusted annually for inflation under the current plan, and we have never had enough money in the pot for maintaining our current infrastructure, much less accommodating additional density.	Maggie McCann

"Mid-City is also serviced by existing and potential fire stations located outside of the planning area, however, additional resources may be needed to maintain adequate fire services in Mid-City." True. But until you have funding allocated for those resources, do not add more density anywhere near Very High Fire Hazard areas, including all of Kensington. The VHFH area covers most of Kensington, all the way to within a half-block of El Cajon Blvd. Because SB 79 allows the city to permanently bypass fire-prone areas if they move that density elsewhere, the City of San Diego should shift Kensington's required transit housing allocation out of the canyon-locked neighborhood entirely, pushing those units down toward safer transit nodes south of El Cajon Boulevard. The fire zone map should neutralize the threat of rapid, unchecked SB 79 commercial upzoning on Adams Avenue. Any future buildings on Adams Avenue should be strictly capped in height and heavily regulated for wildfire safety. Cities have the right to temporarily exempt or defer implementation of SB 79 upzoning on parcels located within state-designated Very High Fire Hazard Severity Zones until approximately 2030. As nothing in our geographically-constrained neighborhood, surrounded on three sides by fire-prone canyons, can be changed to make fire less of a threat, the only choice is to shift the density to an area that doesn't have a single exit point for emergency evacuation. Kensington's evacuation route has to go south to EL Cajon Blvd. Packing high-density multi-family housing along the narrow streets that serve both as that evacuation route as well as the ingress route for fire trucks and emergency vehicles is a recipe for disaster.	Maggie McCann

"As a homeowner in Normal Heights, I am very concerned about this update to the Mid-City community plan. While I understand the need for affordable housing, our streets and sewers were not built for the massive expansion that is currently going on in Uptown and now included in the proposed plans for Mid-City. Increased density should be kept strictly on El Cajon Blvd and University Ave where the transit lines currently are, though not to the extreme density level that this draft suggests. Adams Avenue should be 2-3 story maximum to keep with the aesthetics of the area. Developers should not be allowed to build without parking spaces allotted for every unit, as parking is already limited on residential streets and most people have 2 cars per unit to support working and split rent. The rest of Normal Heights should be kept at 2 STORY MAXIMUM and LOW DENSITY (Low 2 to Low 3 MAXIMUM on your plan examples) to preserve our historic homes (our homes are over 100 years old too- not just Kensington), yard privacy, sunlight access/ views and small neighborhood feel, while not overwhelming the outdated sewer lines and already overcrowded parking. I am beyond disappointed that this draft plan allows for much higher (four story!) and larger complexes (“medium” density that’s actually quite dense) in the neighborhood streets of Normal Heights. I expressed this intense concern in community meetings, along with over 200 Normal Heights residents who do NOT want this level of growth. We all asked for land use concept 5 - keep it at current heights and density- but the City ignored us all and is doing what they want to profit from development. Please think about responsible, sustainable development, don’t open up all of Normal Heights for massive development with greater than 2 story buildings!!! "	Kristin Mueller

"This comment is submitted by the San Diego Fair Housing Lab. It is one of 5 elements we are commenting on in this form; the full set is the fifteen findings in ""Fair Housing Findings on the Mid-City Plan Update"", delivered to the Planning Department in print and by email, and posted with the supporting review, corridor analysis and four community reports at https://data.sdfairhousinglab.org/. Findings are numbered as in that document. FINDING 15. Publish engagement participation by community planning area, and return before the second draft to the communities the process did not reach, at times and in languages that work for people with long or irregular hours. The draft reports that ""more than 3,000 people (as of June 2026) provided over 10,000 comments through 108 events and 2 online surveys."" That is a meaningful level of participation and this comment says so. None of it is published by community, so whether all four communities were proportionately represented cannot be determined from the record. ANSWER COMMUNITY BY COMMUNITY The draft's fair housing and anti-displacement content speaks of Mid-City as one place. This comment asks that the City's response to it, and the second draft's own fair housing analysis, state which of the conditions documented here it accounts for and which it does not, in four separate answers rather than a single plan-area narrative. The four communities share a boundary. They do not share a story. In the draft plan: Introduction. ""Community Engagement,"" printed pp. 10 to 11. Implementation, Chapter 8, for the second-draft process. Supporting analysis: Mid-City Communities Fair Housing Review, Chapter 7 and requests 8.9 and 8.10; Chapter 9, question 6."	Wesley Morgan

EVIDENCE The Introduction lists the engagement by format: 5 community forums, 7 workshops, 7 Working Group meetings, 11 office hours, 11 community interviews, 17 community planning group meetings, 17 pop-up stations, 27 youth engagement sessions and 6 focus groups, the last marked upcoming. It does not list it by place. For a plan that treats four communities as one Mid-City, that omission matters, because the four are not equally able to show up. - Low participation from City Heights would not indicate low stake. It is the plan area's most crowded community, carries its highest environmental burden, and its residents are the least able to give a weekday evening to a document about the next thirty years. A process that reads quiet as agreement will systematically underweight the community with the most at risk. - Normal Heights and Eastern Area both carry conditions that raise the stakes of being heard: Normal Heights for its Black population decline and complete designation coverage, Eastern Area for a compositional shift the State's instruments do not register (Finding 7). - If the engagement record cannot establish proportionate representation, the second-draft process should include targeted outreach to each of the four planning groups, scheduled outside weekday evenings, located inside each community, and translated.	Wesley Morgan

"This comment is submitted by the San Diego Fair Housing Lab. It is one of five elements we are commenting on in this form; the full set is the fifteen findings in ""Fair Housing Findings on the Mid-City Plan Update"", delivered to the Planning Department in print and by email and posted with the supporting review, corridor analysis and four community reports at https://data.sdfairhousinglab.org/. Ten of the fifteen concern this element. Each is stated below as the ask and the headline finding; the evidence, tables and page references for each are on its page of the delivered document. FINDING 1. The City should say plainly what this plan can and cannot accomplish, and where in the rest of the city it intends to create the opportunity access that Mid-City residents cannot reach from here. Twenty-one of the thirty tracts in this plan area have no High or Highest Resource neighborhood on any of their borders. For eleven of them, every neighboring tract is in the State's lowest tier as well. A plan drawn only inside this boundary cannot fix that on its own. FINDING 2. Perform and publish the affirmatively furthering fair housing analysis the draft says it is carrying out. The draft states, in its own words, that the City is reversing patterns of segregation and reducing concentrations of poverty, consistent with local, state and federal fair housing law. The spatial analysis that would show it is not in the document. This is checkable by anyone in ten minutes and depends on no figure we produced. FINDING 3. Publish residential capacity by community planning area. The plan-area total is already on page 15; the split among the four communities is not. Table 2-1 puts the plan area's possible net new homes at 42,000 over the 30-year horizon, from 53,500 to 95,500. The draft does not say how much of that lands in City Heights, Eastern Area, Kensington-Talmadge or Normal Heights. Until it does, no distribution question in this comment can be answered, including by the City.	Wesley Morgan

FINDING 4. Publish a Fair Housing Distribution and Opportunity table for the four communities, because affordable housing in this plan area is being permitted where opportunity is lowest. City Heights, every one of whose fifteen tracts sits in the State's lowest opportunity tier, is the only community of the four permitting affordable homes above the citywide rate. The three communities that hold every Moderate and High Resource tract in the plan area permit at 18 to 42 percent of that rate. FINDING 5. Say what ""to the maximum extent feasible"" means in Policy 2.15, and turn Policies 2.16 and 2.17 from support and consideration into a trigger, a date and published data. Policy 2.15 supports onsite very-low and low-income homes in market-rate projects ""rather than paying in-lieu fees, to the maximum extent feasible."" The plan does not say who determines feasibility, against what criteria, or how the public would learn the result. The difference between an onsite home and a fee matters most in Kensington-Talmadge, which permits affordable homes at 4.9 per 1,000 existing against 11.8 citywide. FINDING 6. Make the anti-displacement commitments measurable: a baseline, a target, a date and an annual public report, without changing a single policy. Policies 2.9 through 2.18 are more specific than most community plans provide. They name tools rather than gesturing at intent. None of them has a baseline, a target or a reporting mechanism, so no one, including the City, can determine whether they are working.	Wesley Morgan

FINDING 7. Supplement the State's Neighborhood Change designations with a broader displacement screen, applied at community and corridor level, using population change, crowding, rent trajectory and racial composition. Eastern Area carries zero neighborhood change designations across all seven of its tracts. Over the same period it grew 15.4 percent, its White non-Hispanic population fell 26.0 percent, and its population of color grew 42.1 percent. A plan that uses the State's designations as its scoping tool would miss this community entirely. FINDING 8. Hold both fair housing obligations at once: make Kensington-Talmadge reachable at a broader range of incomes, and hold Normal Heights' higher-opportunity status open to the residents already there. Inside this plan boundary the duty to expand access to opportunity lands on two communities, not one, and they need different things. Kensington-Talmadge holds the affluence concentration and District 9's only Persistent RCAA tract. Normal Heights holds the plan area's single High Resource tract, and has lost more than three quarters of its Black residents since 2000. FINDING 9. Set a baseline for naturally occurring affordable housing in each of the four communities, at both 60 and 80 percent of median family income, and report against it. The two thresholds tell different stories. At 80 percent of median family income Mid-City is still a broadly affordable place: 79.8 percent of its rentals, against 53.1 percent citywide. At 60 percent it has stopped being one: 83.0 percent of rentals in 2000, 46.9 percent now, a loss of 11,028 homes. A preservation target set at 80 percent would report most of this stock as intact. FINDING 10. Report the plan area's loss of children as a plan condition, and carry it into the anti-displacement baseline. A community that cannot keep its families is not one a 30-year plan can treat as stable. The plan area lost 15,350 residents under 18 since 2000, a 34.3 percent decline against 12.3 percent citywide. These thirty tracts are about a tenth of the city's, and they account for 43 percent of San Diego's entire loss of children. The Introduction reports population and housing growth (Table 1-2, Figure 1-3) without saying who left."	Wesley Morgan

"This comment is submitted by the San Diego Fair Housing Lab. It is one of 5 elements we are commenting on in this form; the full set is the fifteen findings in ""Fair Housing Findings on the Mid-City Plan Update"", delivered to the Planning Department in print and by email, and posted with the supporting review, corridor analysis and four community reports at https://data.sdfairhousinglab.org/. Findings are numbered as in that document. FINDING 11. Complete the air and noise assessment the City committed to in August 2025 before the highest-density designations are finalised, and set residential intensity by measured roadway volume rather than one corridor treatment across a tenfold range. The Draft Ideas Report of August 2025 said the additional density between El Cajon Boulevard and University Avenue and along SR-15 would be studied ""while assessing considerations related to fair housing, air and noise pollution, and feasibility testing."" The density is in the first draft. The assessment is not.	Wesley Morgan

EVIDENCE Designated corridor | Daily traffic College Avenue | 25,200 to 44,400 Euclid Avenue | 6,300 to 34,400 Home Avenue | 17,300 to 32,400 University Avenue | 11,000 to 29,100 El Cajon Boulevard | 14,600 to 21,800 Fairmount Avenue | 4,700 to 18,900 Adams Avenue | 5,800 to 15,800 Federal Boulevard | 5,400 to 9,400 Orange Avenue | 2,400 to 6,800 Chollas Parkway | 4,400 Note: City's Draft Existing Conditions Mobility Assessment, Table 6.7 and Figure 5.3. Segment ranges within each corridor. - Peak segment volumes on the designated corridors run from 4,400 vehicles a day on Chollas Parkway to 44,400 on College Avenue under a single corridor designation. Fairmount Avenue varies fourfold along its own length; a corridor-wide designation cannot be right at both ends. - The draft's own Chapter 4 names the burden. At printed pages 61 and 62 it says Mid-City communities ""are closely situated to high-traffic corridors,"" that traffic-related pollutants ""are known to worsen respiratory and cardiovascular health,"" and that ""this pattern of freeway pollution likely helps explain higher asthma burdens."" The analysis and the response both stop at the freeways: Policy 4.10 encourages air-pollution building features within 500 feet of a freeway (printed p. 78). The arterial corridors carrying the highest residential designations get no exposure analysis, no comparable standard, and no health risk assessment.	Wesley Morgan

A PROPORTIONATE RESPONSE The City's own data show enough variation among corridors to warrant a differentiated response, with no exposure level or health risk category asserted here, following the California Air Resources Board's 2017 advisory: concentrate the highest designations at nodes on College, Euclid, Home and University and step intensity back from the roadway edge; differentiate by segment on El Cajon, Fairmount, Adams and 54th; use the roadway edge for active commercial frontage; and require filtration and protected air intakes for homes in near-roadway zones. On Chollas Parkway, Orange, Federal and College Grove Drive, roadway exposure is not the governing consideration, and this comment says so. In the draft plan: Sustainability, Equity, Resilience and Conservation. ""Air Pollution"" and ""Noise,"" printed pp. 61 to 62. Land Use and Economic Prosperity, Figure 2-1, printed p. 13 and pp. 16 to 25. Draft Ideas Report, August 2025, land use concept notes. Supporting analysis: Mid-City Corridors Supplemental Analysis, sections 1, 5, 7 and recommendations 1, 2, 4, 5, 6; Fair Housing Review Chapter 6 and request 8.8."	Wesley Morgan

"This comment is submitted by the San Diego Fair Housing Lab. It is one of 5 elements we are commenting on in this form; the full set is the fifteen findings in ""Fair Housing Findings on the Mid-City Plan Update"", delivered to the Planning Department in print and by email, and posted with the supporting review, corridor analysis and four community reports at https://data.sdfairhousinglab.org/. Findings are numbered as in that document. FINDING 12. Concentrate the highest designations where transit demand is measured to be strongest, and re-justify the Marketplace at the Grove and Federal at Euclid villages on the basis the data support. Two of the plan's transit villages sit where transit demand is weakest and traffic heaviest. Marketplace at the Grove records 429 daily boardings and alightings against 44,400 vehicles a day, the lowest ratio in Mid-City. Fairmount at University, the busiest transit location in the plan area at 3,458 on 15,900 vehicles, is designated corridor. EVIDENCE: THE CITY'S OWN STOP COUNTS AGAINST ITS OWN TRAFFIC COUNTS Location | Daily boardings and alightings | Daily traffic | Per 1,000 vehicles | Proposed role Fairmount Ave and University Ave | 3,458 | 15,900 | 217.5 | Corridor, beside Mid-City Center 43rd St and El Cajon Blvd | 1,653 | 19,500 | 84.8 | Transit village, Mid-City Center 54th St and El Cajon Blvd | 1,266 | 15,400 | 82.2 | Transit corridor College Ave and University Ave | 1,425 | 25,200 | 56.5 | Transit corridor Euclid Ave and Federal Blvd | 366 | 29,400 | 12.4 | Transit village College Ave and College Grove Dr | 429 | 44,400 | 9.7 | Transit village Note: Mobility Assessment Table 4.1 (273 stops, combined by intersection across routes and directions) and Table 6.7. The ratio across thirteen major locations spans twenty-two fold. The Assessment's own list of five ""highest ridership"" locations does not match its Table 4.1; this ranking is built from the table.	Wesley Morgan

Mid-City Center, which the plan calls a community village, is sited correctly, and this comment says so plainly. The plan places it along Fairmount Avenue, El Cajon Boulevard and University Avenue (printed p. 88), which takes in the two busiest transit locations in the plan area, Fairmount at University and 43rd at El Cajon; together they carry 5,111 daily boardings and alightings, nineteen percent of all transit activity in the study area. - Marketplace at the Grove and Federal at Euclid are large sites in consolidated ownership, and planning a village at either for its redevelopment potential is sound planning. The label is what the data do not support, and the label determines the design. A village justified by transit belongs at its densest close to the street. A village justified by site availability on a roadway carrying 44,400 vehicles a day is the strongest candidate in Mid-City for setting homes back from the roadway edge (Finding 11). - On planned service. The draft justifies the College Grove village by ""high-quality transit, including the planned Rapid 256,"" and the Federal and Euclid village by bus rapid transit and ""the potential for a future transit station as part of the planned Trolley Purple Line"" (printed p. 89). It states no timing or funding for either, and the Mobility chapter says only that the Purple Line ""is planned ... with two stations in Mid-City"" (printed p. 123). The 429 and 366 figures are present-conditions measurements; the plan should say when, and on what funding, the service it relies on arrives. In the draft plan: Urban Design. Figure 5-5, Marketplace at the Grove Study Area, printed p. 93, and its text at p. 89; Figure 5-6, Federal Boulevard and Euclid Avenue Study Area, printed p. 94. Mobility, Figure 6-3, Planned Transit Network, printed p. 124. Supporting analysis: Mid-City Corridors Supplemental Analysis, sections 3c and 4 and recommendation 3; Mobility Assessment Tables 4.1 and 6.7.	Wesley Morgan

FINDING 13. Reconcile Figure 2-1 with Figure 5-1, or restate the Transit Neighborhoods definition to match the designations actually applied. The land use map does not deliver the graduated pattern the urban design framework describes. The Urban Design Framework defines Transit Neighborhoods as ""a mix of neighborhood-friendly housing types and markets that provide a transition from transit villages, corridors, and main streets"" (printed p. 82), and Figure 5-1's own legend calls them ""lower-scale buildings and missing-middle housing types"" (printed p. 83). Much of the ground Figure 5-1 labels that way carries Residential Medium-3 and Medium-4 on Figure 2-1, at 56 to 109 homes per acre, applied across whole blocks. A uniform field at those densities is a transition from nothing to nothing. EVIDENCE The draft's own text at printed page 14 says the land use map ""establishes a graduated pattern of development, transitioning from higher densities along urban and community villages and transit corridors to medium and lower densities within the surrounding neighborhoods."" Figure 5-1, the Urban Design Framework, sets out the node-and-transition structure that sentence describes: Transit Villages concentrating the highest density around transit, Transit Corridors along main transit routes, Transit Neighborhoods stepping down behind them. Figure 2-1, Planned Land Uses, departs from it in three respects. - The highest designation is applied linearly, not at nodes. Community Commercial at up to 218 homes per acre runs as a near-continuous ribbon along the full length of El Cajon Boulevard and University Avenue, while Figure 5-1 identifies a small number of villages. - Intensity does not decline with distance from the roadway. Across Normal Heights south of Adams Avenue and through western City Heights, Medium-3 (56 to 73) and Medium-4 (74 to 109) are applied across whole blocks in a substantially uniform field. A parcel three blocks from El Cajon Boulevard carries broadly what a parcel facing it carries. - The two figures describe the same ground differently. Much of that Medium-3 and Medium-4 area falls inside what Figure 5-1 labels Transit Neighborhoods.	Wesley Morgan

THE TRANSITION FAILS IN TWO DIFFERENT WAYS IN THE TWO HALVES OF THE PLAN AREA In western Mid-City the transition is absent because the medium-density field is continuous, several streets deep between El Cajon Boulevard and University Avenue. In eastern Mid-City it is absent because there is nothing between the corridor and the single-family blocks: along University Avenue near College Avenue and 60th Street, Community Commercial at up to 109 homes per acre abuts Residential Low-2 at 5 to 9 directly, with no intermediate designation. The same missing gradient produces uniform intensity in one half and an abrupt edge in the other. Neither is the transition Figure 5-1 describes. Note: These observations describe pattern, not parcels, and are taken from the published figures and the City's interactive land use map at the resolution released. This is not an argument against the densities; it is an argument that the plan's two figures should agree about where they go, and that the depth gradient in Finding 11 is the mechanism that would make them agree. In the draft plan: Urban Design. Figure 5-1, Urban Design Framework, printed p. 83, and the framework definitions at p. 82. Land Use and Economic Prosperity, Figure 2-1, Planned Land Uses, printed p. 13, with the designations at pp. 16 to 25, and ""Transitions,"" printed p. 14. Supporting analysis: Mid-City Corridors Supplemental Analysis, section 6 and recommendation 7."	Wesley Morgan

"This comment is submitted by the San Diego Fair Housing Lab. It is one of 5 elements we are commenting on in this form; the full set is the fifteen findings in ""Fair Housing Findings on the Mid-City Plan Update"", delivered to the Planning Department in print and by email, and posted with the supporting review, corridor analysis and four community reports at https://data.sdfairhousinglab.org/. Findings are numbered as in that document. FINDING 14. Address the corridor conditions alongside the intensity decision. Mid-City recorded 316 pedestrian injury collisions in five years, concentrated on the corridors receiving the most new capacity, which also carry no low-stress bicycle route and the plan area's worst peak-hour intersections. The City's Mobility Assessment records 316 pedestrian-involved injury collisions between 2018 and 2022, 16 of them fatal, concentrated on El Cajon Boulevard, University Avenue and Fairmount Avenue. Four of the fatalities were at El Cajon intersections and four at University intersections. These are the corridors where Figure 2-1 places its highest residential designations. EVIDENCE Intersection | AM peak delay | AM | PM peak delay | PM | Automobile collisions 2018-22 College Ave and University Ave | 96.2 sec | F | 142.7 sec | F | not top eight Home Ave and Fairmount Ave | 112.4 sec | F | 76.6 sec | E | 18 Euclid Ave and University Ave | 56.6 sec | E | 56.4 sec | E | not top eight Fairmount Ave and El Cajon Blvd | 56.0 sec | E | 31.4 sec | C | 29, highest in Mid-City Fairmount Ave and Aldine Dr | 13.2 sec | B | 118.7 sec | F | 54th St and University Ave | 24.7 sec | C | 31.8 sec | C | 16 Fairmount Ave and University Ave | 42.1 sec | D | 40.7 sec | D | 15	Wesley Morgan

Note: Mobility Assessment Tables 6.9, 6.3 and 4.1. Twelve study intersections operate at level of service E or F in a peak; six are freeway ramps on I-805 and I-15. Level of service is reported here as a livability and transit-reliability measure; it is not the basis for the exposure findings, which rest on daily volume. - College Avenue at University Avenue fails in both peaks and lies on a corridor the plan treats as suitable for its highest intensities. Fairmount at University, the busiest transit location in Mid-City, does not appear among the substandard intersections: the place with the strongest transit demand is not the place with the worst congestion. - El Cajon Boulevard at Fairmount is the most frequent automobile collision location in Mid-City at 29, on a comparatively modest 9,400 vehicles a day, which points to a design condition rather than a volume condition. - The Assessment finds every major corridor in Mid-City at bicycle level of traffic stress 3 or 4 in its entirety, University Avenue primarily 4, and no low-stress route spanning the community in either direction. Transit runs in the same lanes as general traffic on the corridors with the highest passenger activity. - The City's own Mobility Board made an overlapping case independently in its comment letter of 19 August 2026: safety as the top priority of a detailed implementation program, a ranked project list, and infrastructure investment tied to planned growth. This comment aligns with that letter and adds the placement question in Findings 11 and 12. In the draft plan: Mobility. Figure 6-1, Planned Pedestrian Network, printed p. 120; Figure 6-2, Planned Bicycle Network, printed p. 122; Figure 6-4, Recommended Street Classifications, printed p. 127. Implementation, Chapter 8. Supporting analysis: Mid-City Corridors Supplemental Analysis, sections 2, 3, 3b and 3c, recommendation 8; City of San Diego Mobility Board letter, 19 August 2026."	Wesley Morgan

I am struck by the fact that that my area of Kensington (between Adams and El Cajon) has been targeted for the addition of apartments up to eight stories, in an area that is now small, single-family home (some of which are historic). The fact is that transportation along Adams Avenue could not be considered a "transportation corridor" by any stretch of the imagination – making that argument for drastically increased density a huge stretch. In addition, the fact that the committee believes that no parking should be provided in these apartments is short-sighted and indefensible. Since paid parking was established along Adams, the parking on my street has been heavily impacted. The addition of more vehicles with no additional parking will negatively impact businesses (even more than currently), decrease safety, and impact our ability to leave the area in case of fire. I strongly reject the proposal to add multi-story apartments in our historic neighborhood, and to do so (in order to chase state funds, rather than support existing well-functioning neighborhoods) is a sell out.	Karen Bachofer
This data is nonsensical. If you look at your other figures, the population of Mid-City has decreased over the past several years, but you anticipate it doubling??? It has taken 100 years to grow, with significant retraction in the last 10 years, but somehow we need to prepare to double in size in the next 20 years?! This is completely ridiculous and does not match historic data nor the birthrate data for the county and country. This projection is clearly based on developer's wants and not population needs.	Caroline McKeown
Figure 5-2: Please expand the Terralta Freeway Cap Park at least 1 more block South to connect Ward Canyon Park to the proposed park expansion and give Normal Heights and Kensington the greenspace (and dampened freeway noise) we were promised in the 1990s! Page 95: INCREASE TRANSIT! We are not connected to anything. If you insist on increasing density (in already dense communities), give us the transit so transport people to/from their jobs. Otherwise parking is going to be insane (spoiler alert - it already is!)	Caroline McKeown
we need more parks and public facilities. full stop.	Caroline McKeown

I am a property owner in Kensington, and have resided here for over 40 years. Recently our local Ken-Tal Planning Group submitted a proposed map of density and allowed development, which was rejected by the City Planning Department with no comment or reason given for said rejection. Your own proposal in the First Draft is unacceptable to me and many other residents I have spoken with. The development plan for the Adams Avenue corridor and adjacent blocks allows Community Commercial (109 du/ac) along Adams and for the adjacent blocks to the north and south Residential Medium 2 and 3 (54 and 73 du/ac). This proposal invites the destruction of a community that is historic, livable, and sustainable, creating congestion, noise, pollution, and a straining of resources. Specifically, this area is in a high risk fire zone, and at present surface streets would be dangerously strained in the event of a fire requiring resident evacuation. Doubling the population would be inviting a tragic disaster for which the City would be unprepared, and potentially liable for loss of life and property. The proposed density is out of scale for this area, and does not seem well thought out on the part of the City. The original legislative intent of CA SB 1069 was to allow more infill in the form of "accessory dwelling units", widely understood as small backyard or garage units. Over time, this has been turned into a carte blanch invitation for corporate and industrial developers. The companion legislation, AB 2299 was in my opinion an illegal usurpation of local cities and counties right to manage growth and development in their areas. San Diego has taken this path with a vengeance, and you can see the results wherever you go in our City. Over-large, block-size developments pop up everywhere, featuring mostly market-rate rental units that are over priced for the average San Diego family. These developments are ugly, and literally block out the sun for the surrounding residents. They do very little to provide 'affordable housing' or an entry into home ownership for average people. They appear to me to be a money making proposition for builders, developers, real estate professionals and absentee property owners and investors. I don't see much benefit at all for the people of San Diego.	Russ Hamm
The City Council recently enacted the "Preservation and Progress Package A" reforms in February 2026, which give elected officials the authority to override expert historic designations when permitting and allowing development. I question the legality of this move, which appears designed to give more power to developers and less power to community members. The Kensington area is in process, pending an official designation on the National Register of Historic Places. That is supposed to mean something. Allowing the kind of development you propose would destroy the historic nature of the neighborhood.	Russ Hamm
Please consider the proposal submitted by David Moty, et al. re Talmadge/Kensington. They spent hours developing this plan and they deserve to be heard.	Tina Abernethy

"Since the bulk Mid-City plan hinges on pubic transportation, the fact MTS is cutting back on bus and trolley service by at least a third needs to be dealt with first before this plan is implemented. In addition, Aldine/Euclid traffic needs to be addressed and resolved. "	Tina Abernethy
Proposed zoning will allow for 6-8 Story multi-family apartment buildings that are not appropriate or compatible with the historic nature of our community, and the increased density while making no commitments for funding infrastructure or amenities is unsatisfactory. Such development lacks foresight and may be legally objectionable. The Plan fails to adequately address parks, schools, and other public facilities pertinent to Kensington-Talmadge. There appears to be a disproportionate burden placed on Ken-Tal.	Lynn Stuart
Boundaries of existing & proposed historical districts were not included in the draft plan, nor were they respected in the City's zoning decisions.	Lynn Stuart
Ok I have several comments. First, Bus-Bike lanes are not acceptable. Who in their right mind wants to risk death going down El Cajon Blvd on a bike in bus lane that starts and stops. Good golly, as planners you need to be more aware of the dangerous situations you are creating. This is lazy planning. Bus-Bike should not exist in any plan. Only safe separated bike lanes are acceptable in order to get us a bike network that people actually will use. Next- how is the Aldine/Monroe Intersection being solved? You guys need to get granular with this as it's an important east-west connection that needs to be fixed. Next I see a class I multi-use path proposed at Aldine up to Adams Ave in Kensington. I LOVE this idea, but is it actually possible given the steep canyon drop off??? I am seeing a lot of very expensive proposals for infrastructure in here that I worry would never get built. There could be more cost effective solutions that get the same connection result, but maybe are more politically tough. Add those in to your planning as well please. Finally, Adams ave should have a protected bike lane. This is just a no brainer. Class III Enhanced Bike is just not going to cut it at this point. Safety! People die on bikes ALL THE TIME because of lack of safe street design.	Kyle R

As the planners are aware, Talmadge lacks park and nature access. I like the idea of trying to bring some respite into this neighborhood through the Overlook and Trailhead park idea, but please provide more information about what this means and looks like. If this is all that is being planned for in the next 30 years then these are critical and need to be implemented. Currently there is a fence at the end of Miracle Drive in Talmadge that would lead to a great overlook park and potentially a canyon trail. It looks like the city is suggesting this spot in the update. Not sure why it is fenced off currently though. The update also shows an overlook park on Monroe behind Hoover HS. There is wasted space behind the football field stands that would be perfect for a pocket park. It is almost directly across from the overlook. Right now it's a place for trash to gather and has no use. Please include this in the update as well to create a unique little park area and overlook in Talmadge. Next, I see a potential trail around Kensington. I love this and really hope it is feasible. But this trail should be connected to Talmadge also. There should be a pedestrian crossing at Aldine (under the Fairmount Overpass) to extend the trail across aldine and up the canyon to the Miracle Drive overlook that is proposed. This will connect Talmadge to a nature in ways it currently is disconnected and adding an incredible neighborhood amenity. It also helps connect Kensington and Talmadge in ways it was originally intended in 1926 with the originally proposed Adams Ave bridge that was never built.	Kyle R

"There was a reason developers once gave San Diego neighborhoods names such as Estates, Park, Heights, Terrace and Gardens. These names reflected a planning philosophy that valued light, air, landscaped streets, yards, setbacks and open space. “Estates” did not mean mansions on enormous lots. In neighborhoods such as Talmadge, the homes were often modest. What made these communities special was how the houses and landscape worked together, with front and rear yards, side setbacks, landscaped parkways, trees and breathing room between buildings. These spaces aren’t leftover land waiting to be developed. They are part of the neighborhood plan. That history is especially important today. The Talmadge Park Estates Historic District (TPEHD) was listed on the National Register of Historic Places in 2024 because it represents an important period in Community Planning and Development and the evolution of the small-house suburb during the Great Depression and FHA era. When the City of San Diego Historical Resources Board considered the district in 2024, City historic preservation staff specifically recognized how little the neighborhood had been altered. In his report supporting the district, Senior Planner Bernard Turgeon wrote:	Laura Henson

“In general, Talmadge Park Estates Historic District has not been impacted by teardowns, inappropriate infill or redevelopment to any significant degree and retains a distinct sense of time, place and character as a whole.” That is precisely what makes the TPEHD historically significant today. The entire district itself is the historic resource and not the individual homes. Its modest houses, consistent setbacks, landscaped parkways, yards, curving streets, historic streetlights and ornamental gates work together to create its historic character. Yet the draft Mid-City Communities Plan proposes Townhome areas within portions of this nationally recognized historic district. Figure 2-1 on page 13 shows relatively limited Townhome areas elsewhere in Mid-City, with a notable concentration in Talmadge within the historic district. Why? Mid-City can add substantial housing without sacrificing its historic neighborhoods. El Cajon Boulevard and our other commercial corridors offer opportunities for mixed-use housing, neighborhood businesses, jobs, walkability and economic revitalization. We can build housing while protecting the planning principles that made TPEHD special in the first place. The yards matter. The trees matter. The setbacks matter. The streets matter. The spaces between buildings matter. The draft Mid-City Communities Plan itself recognizes the importance of historic preservation. On page 37, under Goals, it states: “Significant historical resources are identified, preserved and celebrated as part of Mid-City’s evolving community fabric.” “Educational opportunities and incentives support the ongoing maintenance and preservation of historic resources.”	Laura Henson
We have achieved historic designation status and it needs to be preserved as such.	Patricia. Hughes

"Our Request to the City 1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods."	Joren Coleman
"Mid-City can add substantial housing without sacrificing its historic neighborhoods. El Cajon Boulevard and our other commercial corridors offer opportunities for mixed-use housing, neighborhood businesses, jobs, walkability and economic revitalization. We can build housing while protecting the planning principles that made Talmadge Park Estates Historic District special in the first place. The yards matter. The trees matter. The setbacks matter. The streets matter. The spaces between buildings matter. The draft Mid-City Communities Plan itself recognizes the importance of historic preservation. On page 37, under Goals, it states: "Significant historical resources are identified, preserved and celebrated as part of Mid-City's evolving community fabric." "Educational opportunities and incentives support the ongoing maintenance and preservation of historic resources." The City needs to put its money where its mouth is. Remove the proposed Townhome zoning (Residential Low 4) from the Talmadge Park Estates Historic District and restore the area to single-family zoning (Residential Low 2)."	Dan Heller

"We can add housing without sacrificing our historic neighborhoods. Build Up - Not Out. Our Request to the City 1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Paul Hadjipieris
"Talmadge Estates is a nationally recognized historic district. My house was built in 1939 and we are the second family to occupy the home in its history. Our neighborhood raises money to help the community around us from charitable donations to Hoover High School to our big Toys for Tots event in December in which we partner with the Mid City Police. There is a ton of great underdeveloped land just two blocks south of us on El Cajon Blvd which would make outstanding mid-to-large scale walkable development, with great access to public transportation infrastruture that already exists. We should develop the El Cajon Blvd district before we start building large apartment buildings in residential neighborhoods with narrow streets, inadequate utility infrastructure, limited parking, and zero parks or recreational facilities."	Anthony Woodruff
"We can add housing without sacrificing our historic neighborhoods. Build Up - Not Out. Our Request to the City 1. Retain the existing residential land-use designation and allowable FAR throughout the entire Talmadge Park Estates Historic District, including contributing and non-contributing properties, and follow the City of San Diego Municipal Code provisions applicable to National Register historic districts. 2. Quantify the realistic housing capacity of Mid-City's commercial and transit corridors before substantially increasing development intensity within established residential and historic neighborhoods.	Irene Nevarez
The city MUST do right by Talmadge Park Estates. It is a HISTORIC DISTRICT. Preservation is key. Building out will ruin our beloved neighborhood. Don't be stupid. Do the right thing.	Esther Leeflang

The neighborhood of Talmadge worked hard to obtain historic neighborhood status and it deserves to be celebrated and protected. Please exclude the historic district from any new density allowances and instead seek opportunities for more housing on El Cajon Blvd.	Janet Mueller
This plan has not addressed sufficiently the life and safety impacts of existing residents, (or the added residents envisioned by the plan) in a serious and transparent effort. There are serious evacuation and access implications affecting the life and safety of our residents that need to be considered as a primary objective of any plan for the future.	Terry Mendez
Additional mobility and environmental work supporting the Second Draft should include a quantitative, location-specific analysis of wildfire evacuation capacity and simultaneous emergency-responder access in Kensington, Talmadge and other at-risk communities in the Mid-City area.	Terry Mendez
The first draft acknowledges substantial wildfire exposure and proposes increased residential capacity, but it does not provide route-specific modeling showing whether Kensington's constrained street network can accommodate evacuation under wildfire conditions. The statement that most proposed land-use change would occur outside the Very High Fire Hazard Severity Zone does not resolve this issue.	Terry Mendez
Evaluate Kensington separately rather than relying solely on Mid-City-wide averages. Model evacuations initiated from different portions of Kensington and the possible loss or obstruction of a principal route. SDGE is starting the under grounding of utilities on Marlborough and Vista first. The streets will be blocked while torn up. Then more under grounding follows. This needs to be considered. Identify feasible mitigations, infrastructure improvements, parking or access-management measures, operational plans and implementation triggers needed to prevent proposed growth from degrading evacuation or emergency-response performance.	Terry Mendez

I wanted to share an article of mine that was published in the OB Rag today. As of this evening, it has received more than 1,400 views. I am sharing it with you because it presents important research and analysis related to the Mid-City Communities Plan Update that I believe is relevant to the current discussion. San Diego Tried Tis Before In Mid-City. Why Are We Repeating The Same Mistake? The Alternative: Bring Housing and Business Back to El Cajon Boulevard. By Laura L. Henson San Diego is once again considering dramatic increases in residential density throughout Mid-City as the primary focus of the Mid-City Communities Plan Update. Before assuming that greater zoning capacity automatically produces better neighborhoods, we should examine our own history. Because San Diego has tried this before, with decidedly mixed results. In 1965, the City adopted the Mid-City Development Plan during an era of increasing multifamily development. Over the following decades, portions of Mid-City originally developed with modest single-family homes changed parcel by parcel to make room for apartments and condominiums. The transformation did not occur in isolation.	Laura Henson

Freeway construction divided neighborhoods, while Mission Valley and Fashion Valley emerged as regional shopping destinations. The City's 1984 Mid-City Community Plan acknowledged that the once-thriving commercial strips of El Cajon Boulevard and University Avenue experienced significant decline, due in large part to newer shopping centers in Mission Valley. As a result, City Heights experienced two profound changes simultaneously: increased residential intensity and declining commercial vitality. Density alone did not cause the ensuing problems. Economic and demographic changes, freeway construction, disinvestment and other forces contributed. But City Heights subsequently struggled with concentrated poverty, deteriorating properties, inadequate public facilities and increased crime. Eventually, the City of San Diego changed course. The City's 1984 Mid-City Community Plan also acknowledged that rapid population growth had worsened shortages of public facilities. Schools were crowded, open space was scarce, and parks and recreation facilities were inadequate. Parking had also become a serious concern. City planning documents noted that widespread multifamily development within single-family neighborhoods had exacerbated an already insufficient parking supply.	Laura Henson

To address these problems, the 1998 Community Plan significantly reduced residential densities because of inadequate community facilities and overcrowded schools. In other words, San Diego has already experienced major land-use changes extending beyond commercial corridors and into established single-family neighborhoods. Later generations of planners concluded that growth had outpaced the schools, parks, infrastructure and other community facilities necessary to support it. That gap persists. The lesson isn't that apartments cause poverty or density causes crime. They don't. The lesson is simpler: Upzoning is not planning. Dramatic land-use changes can have enormous unintended consequences when housing, infrastructure, parking, economic opportunity, public safety and neighborhood stability fall out of balance. So why would we risk repeating that mistake in the remaining residential neighborhoods of Mid-City? There is a better alternative. We must bring housing and business back to El Cajon Boulevard.	Laura Henson

The Boulevard possesses something Mission Valley could never replicate: Mid-City's extraordinary cultural diversity. Little Saigon already demonstrates how culture, food and entrepreneurship can create identity and attract visitors. We need to expand that concept. New affordable and market-rate housing can rise along El Cajon Boulevard while successful businesses remain at street level. New restaurants, markets, cafés, shops and other businesses could celebrate the Vietnamese, Mexican, Ethiopian, Somali, Cambodian and other cultures represented throughout Mid-City. El Cajon Boulevard could become an international Restaurant Row—a dining and cultural destination unlike anything else in San Diego. More residents would provide customers for local businesses. New and expanding businesses would create jobs and work opportunities closer to where Mid-City residents live. Restaurants and outdoor dining would bring people onto sidewalks into the evening. Better lighting, landscaping, pedestrian crossings, public spaces and thoughtfully planned parking could make the Boulevard safer and more vibrant. Housing, employment and economic revitalization would reinforce one another. The City already recognizes this potential. Its Complete Boulevard Planning Study envisions part of El Cajon Boulevard as a vibrant, welcoming place for shopping, eating, neighborhood services and pedestrian activity. But instead of repeating the mistakes of the past, let's learn from them. Build housing on the commercial corridors. Restore commerce. Create jobs. Celebrate our many cultures. Protect stable single-family neighborhoods. And finally create the thriving El Cajon Boulevard that generations of Mid-City residents have been promised for decades."	Laura Henson
Preserve preserve, preserve Talmadge Historic District	Dolores Cadena
Remove the proposed Townhome zoning (Residential Low 4) from the TPEHD and restore the area to single-family zoning (Residential Low 2).	Dolores Cadena

"Figure 2-1 shows new zoning for Mid Cities. Specifically for the Kensington neighborhood, the increased density allowed in the rough area between Alder and Madison to the north and south, and between Highway 15 and Van Dyke to the west and east is inappropriate. My understanding is that Adams Avenue in this area is already 75% over capacity. The plan calls for a huge increase in density along Adams Avenue (up to 109DU/AC I believe) and a large increase to the north and south (approximately 50DU/AC I believe). The density per acre is my interpretation of the map in Figure 2-1, which is color coded and hard for those without very good eyesight. In any case, adding more density to around a street that is already 75% over capacity is a public safety problem. In case of fire, and much of Kensington is in the high fire zone, there would be no way to safely evacuate the residents to the north and directly south of Adams Avenue. As was demonstrated in the Palisades Fire, roads can become quickly choked with abandoned cars in a disaster. Before implementing the proposal to vastly increase density in this neighborhood, a comprehensive evacuation analysis should be completed. Any deficiencies should be addressed within the plan update. The plan should not be approved until evacuation safety is fully addressed.	Ralph Hanna
Based on the meeting of the board of the San Diego Metropolitan Transit System bus and trolly service will be reduced by a third in the next few years. Figure 6-3 shows the proposed Trolley Purple Line and many bus routes that may never be inaugurated and may be eliminated due to budget constraints. The plan was created to align zoning with the provisions of SB79. The plan and resulting zoning will live on for decades. If the transit plans are unknown and likely to result in less service, the integrated nature of the plan is destroyed. Decisions on density cannot be intelligently made without accurate long term funding commitments by the city and county to mass transit. Please do not go forward with the community plan without guarantees on the mobility map in Figure 6-3. The plan should not be approved without specific commitments to mass transit.	Ralph Hanna

I know the residents of the Mid Cities would enjoy the new parks and public facilities, the plan only proposes them. The rezoning that will follow the approval of the plan will take place in short order, and we will live with it for decades. The parks and public facilities will only be built if funding allows. It is outrageous for the City to publish a plan, where residents of Mid Cities are expected to welcome higher density, while the City is under no obligation to fulfill its part of the plan. No update to the community plan should be made that increases density without specific concrete action by the City to fund the parks and public facilities proposed by the plan.	Ralph Hanna
Housing development for Kensington-Talmadge area	Andrew Pease
Please be responsible and deliberative when developing the area with large housing units. Parking is a critical consideration. La Mesa village area is struggling with parking after building units with insufficient parking. Let's learn from their efforts. Also of concern is MTB's plan to reduce bus and trolley services on top of raising rates. We need an infrastructure that can meet the housing and development plan. Thank you.	Andrew Pease

Alex Frost, Principal Planner for the City Planning Department, during his presentation of the first draft of the MidCity Communities Plan stated: "I just want to highlight that Kensington-Talmadge Planning Group sent us a letter with their zoning recommendation which we received in July 28, 2026. This was based on the State Bill 79 analysis and the planning group's interpretation and their recommendation. The Planning Group's proposed zoning map does not comply with the State Bill 79 requirements, unfortunately. The bill requires a minimal density requirement for all sites within a half mile and quarter mile area that has been identified with SANDAG." In response David Moty, Vice-Chair of the Kensington-Talmadge Planning Board (KTGB) replied: With regard to the KTPG Proposal he said: "It does comply with SB 79. I disagree with Alex's contention that it doesn't. He never expressed to us what specific violations we have occurred. Could be parts here or there was misinterpreted. A discussion would have been helpful. We never had any discussion. We worked diligently to make sure that our FAR levels met with the requirements." I was appalled that the City Planning Department did not inform our KTPG that their 30-year plan submission was unsatisfactory earlier, but chose to wait until the community met to hear the review of the plan and then chose to embarrass the committee by stating to the assembled community that their plan was unsatisfactory, which sounds like saying the committee in not competent. Then after a committee member stated in response that their plan is in compliance with SB 79, Mr. Frost did not choose to explain how it violated the plan. Obviously, one group or the other is not able to properly interpret the various laws and regulations that apply to adequately drafting this plan. I came away with the conclusion that our city planners don't want informed input from our community, and are only going through the necessary formalities. I also got the impression that they were raising our zoning levels higher than necessary. If the city cares about developing a plan for our community with the interests of our citizens, then surely the only really informed source is our KTPG who have studied the laws and regulations and have a detailed understanding of our neighborhoods. The rest of us do not have an informed opinion. If the city wants to provide a plan to meet the best interests of our communities, then I believe it needs to let our KTPG develop a plan that will meet the legal requirements and not burden us with overdevelopment.	Charles Stebbins

On page 13 of the Draft Mid City Communities Plan update, I want to address a small but significant issue on the map regarding the proposed designation of properties along the south side of Monroe Ave between 44th St and 47th St as Residential Medium (45-54 du/ac). This particular area of Talmadge was developed back in 1926 and named Talmadge Park Unit 3. It is located within the Talmadge Park Estates Historic District and within a VHFHSZ isolated by Fairmount Ave canyon to the west, Aldine canyon to the east, and an additional canyon cutting N/S through the middle to Monroe, with Hoover High School property as a south boundary. Emergency egress is limited to a few streets, none of which head north. Monroe Ave and all streets that head north of Monroe, which includes 44th St, Highland Ave, 45th St, and Max Dr are only 30 feet wide requiring single car egress when vehicles are parked on both sides of street. This already makes it extremely difficult to adhere to San Diego Fire Code §511.0503 which requires 20 feet of road clearance. Due to the proximity to Hoover High School, parking is further affected by the daily parking needs of teachers and students and field events. During large school events, parked cars blocking private driveways often occurs. In the court case of Taxpayers for Accountable School Bond Spending versus San Diego Unified School District, the appellate court's published opinion required an Environmental Impact Report to be developed due to proven parking impacts of field events on the surrounding community. This lack of parking is a known concern, providing a significant impact on the surrounding environment. https://law.justia.com/cases/california/court-of-appeal/2013/d060999.html In addition, only a handful of homes along the west side of 44th St, north of Monroe Ave have driveways which can even accommodate a parked car without blocking the public right of way. Once street parking is gone, a person would have to drive out of the area completely to find parking. This scenario does occur. Recommend reassigning this strip of properties to Residential Low-2 (5-9 du/ac) so these parcels, if fully developed, aren't dumping additional vehicles onto an already congested 30 ft wide residential road. This action would also maintain consistency throughout the Talmadge Park Estates Historic District in this area of Talmadge, west of Aldine Drive.	Ronald Anderson
Focus on, and funding for, development should be directed toward currently under-utilized space, not in the middle of single family neighborhoods. There are literally miles of available space located directly on main transit corridors (ECB, University, ...) that are crying out for development & revitalization. Development and revitalization along these corridors can provide components (community space, shops, restaurants, etc) that are currently lacking AND provide housing opportunities.	Debbie Sanders

Historic resources matter. Historic resources reflect character and uniqueness that should matter within a city. Multitudes of cities throughout California (and the country) benefit from the existence of well integrated historic neighborhoods . Respect, consider and integrate these facts into your update. Design a plan that respects the significance of historic neighborhoods. Use the opportunity to - 1) place mixed use housing & economic revitalization on nearby transit corridors and 2) provide enhanced walkability to existing historic neighborhoods.	Debbie Sanders
Please stop adding more low income housing in City Heights. It will never come up if the City aggressively puts masses of poor people here without balancing it out with other community members.	Anna Mira
Bathrooms need to be functional and open for the community to use parks to their potential. Homeless activity is not the reason to keep the bathrooms closed - it only prevents community members from using the spaces. Examples: Hollywood park, Santa Cruz park.	Anna Mira
Can't see this message? View in browser Historic District Update LAST CALL TO ACTION Why They Were Called “Estates” — Help Protect Talmadge There was a reason developers once gave San Diego neighborhoods names such as Estates, Park, Heights, Terrace and Gardens. These names reflected a planning philosophy that valued light, air, landscaped streets, yards, setbacks and open space. “Estates” did not mean mansions on enormous lots. In neighborhoods such as Talmadge, the homes were often modest. What made these communities special was how the houses and landscape worked together, with front and rear yards, side setbacks, landscaped parkways, trees and breathing room between buildings. These spaces aren’t leftover land waiting to be developed. They are part of the neighborhood plans That history is especially important today. The Talmadge Park Estates Historic District (TPEHD) was listed on the National Register of Historic Places in 2024 because it represents an important period in Community Planning and Development and the evolution of the small-house suburb during the Great Depression and FHA era. When the City of San Diego Historical Resources Board considered the district in 2024, City historic preservation staff specifically recognized how little the neighborhood had been altered. In his report supporting the district, Senior Planner Bernard Turgeon wrote: “In general, Talmadge Park Estates Historic District has not been impacted by teardowns, inappropriate infill or redevelopment to any significant degree and retains a distinct sense of time, place and character as a whole.” That is precisely what makes the TPEHD historically significant today.	Allison Crews

The entire district itself is the historic resource and not the individual homes. Its modest houses, consistent setbacks, landscaped parkways, yards, curving streets, historic streetlights and ornamental gates work together to create its historic character. Yet the draft Mid-City Communities Plan proposes Townhome areas within portions of this nationally recognized historic district. Figure 2-1 on page 13 shows relatively limited Townhome areas elsewhere in Mid-City, with a notable concentration in Talmadge within the historic district. We need to ask why. Mid-City can add substantial housing without sacrificing its historic neighborhoods. El Cajon Boulevard and our other commercial corridors offer opportunities for mixed-use housing, neighborhood businesses, jobs, walkability and economic revitalization. We can build housing while protecting the planning principles that made TPEHD special in the first place. The yards matter. The trees matter. The setbacks matter. The streets matter. The spaces between buildings matter. The draft Mid-City Communities Plan itself recognizes the importance of historic preservation. On page 37, under Goals, it states: “Significant historical resources are identified, preserved and celebrated as part of Mid-City’s evolving community fabric.” “Educational opportunities and incentives support the ongoing maintenance and preservation of historic resources.” The City needs to put its money where its mouth is. Remove the proposed Townhome zoning (Residential Low 4) from the TPEHD and restore the area to single-family zoning (Residential Low 2).	Allison Crews
Increasing density in the eastern portion of the Mid-City area is a mistake without legitimate public transit. Southern California is car-centric by design, and simply densifying neighborhoods only exacerbates traffic and turns neighborhoods into LA where it is impossible to efficiently move about town. This plan is arbitrary and capricious decisionmaking without reasonably considering these impacts. Promoting buses and bikes are not reasonable alternatives, as evidenced by the minimal usage of bus lines in the suburban neighborhoods in the eastern portion of Mid City. The only way such a plan will work is with multiple dense subway lines--you can't build a city like SF, DC, or NYC without them.	Jon C

Please see other answer---any bus or bike focused improvements are not realistic and cannot reasonably address the impacts of this plan.	Jon C
Land use should be for additional affordable housing especially in areas that already have higher income and house prices such as talmadge and kensington. It is unfair for lower income neighborhoods to take the brunt of affordable housing when there are other good options which would then allow for greater economic and social mobility.	Caleb Varela Johnson
As an area that already has significantly less publidc park space than neighboring communities to the north, parks and public facilities should be listed as requirements rather than suggestions so that as density increases, park and green space does not shrink. It must be guaranteed if certain amounts of housing are to be approved.	
I believe that this draft community plan is does not account for bicycle infrastructure as much as it could. I have not seen anywhere in these sections related to bike parking. The only mention of bike parking I see is on page 89, but it is a mere mention. If we want Mid-City to become truly bike friendly and inviting to the bicyclist, we have to dedicate more time and thought into how we envision streets such as El Cajon, Adams Ave, and University Ave as not just serving automobiles, but all multi-modal forms of transportation! I also believe more attention could be given to crosswalks in that same vein. We need to start decentering the automobile and reorient our perspective to the pedestrian, bicyclist, and transit rider.	Eva Jabbari
To ensure that growth is truly equitable, the Plan should include strong and enforceable affordable housing protections. This includes no-net-loss policies, replacement of any demolished or converted affordable homes at similar affordability levels, stronger anti-displacement measures, preservation of naturally occurring affordable housing, deeper affordability requirements, family-sized affordable homes, and clear accountability standards.	Jermaine Rocacorba

My name is Jermaine Rocacorba and I work at Mid-City, and support community members from Mid-City to City Heights. Figure 5-4 says to consider alternative options to limit Lea St extension to bike/pedestrian access-only. We are requesting in the Second Draft to adopt the bike/ped-only treatment of Lea Street as the Plan's FIRM recommendation. I want more pedestrian and bikeway opportunities, free of the dangers of cars for our elders and children. We do not want more cars through the Global Village site. We also believe that the park will be safer for kids and elders, if we prioritize pedestrian access. Many community members have raised concerns about the frequent pedestrian and vehicular accidents that have led to multiple deaths over the years. As a result, our communities have repeatedly expressed the need for more pedestrian and bike safety. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site include safe signalized pedestrian crosswalks on University Avenue and 54th Street, consistent with the Plan's own Vision Zero and Complete Streets goals. Please include a word bubble that says “safe, signalized crossings on University Avenue and 54th Street” in Figure 5-4.	Jermaine Rocacorba

Kensington is one of the few historical communities in San Diego. The plan that was presented to the community on September 21 displayed “an unlimited height allowance” for construction development in the downtown village area of Kensington on Adams Avenue. Along with a 60’ height allowance on the adjacent northern blocks in Kensington. You are RAPING our community with this plan!!! We have lived here since 1985. The encroachment on this historic community was never meant to handle growth to even the extent that it’s in right now with all the ADU’s that have gone in. We are 100% AGAINST this in every way. You need to find another community to put your skyscrapers in. Stop destroying what little integrity we have left here in this historic community!!! Our community wants the names of the individuals that came up with this horrific draft of what you plan to do in our historic community. There were many voices that spoke out on how the traffic and parking problem has intensified 100% over the years with NOTHING being done by our city planning committe to solve this problem!! Our fire commissioner also spoke on the tragedy of what would happen if a fire broke out in this area. There is only one way in and one way out. And now you are planning to completely destroy this area with development!!! There are many many other areas in San Diego, where affordable housing can be built, and yet you have chosen to RAPE one of the few historic communities left in our beautiful city. Again we are 100% AGAINST this plan!!!!	

On the evening of September 21 in the Kensington community Church, a plan was presented to our historic community and the adjacent communities that basically showed zero lack of preservation for our historic community which is one of the few historic communities residing in our beautiful city of San Diego. In the downtown village area of Kensington on Adam's avenue, it showed an "unlimited height allowance" for any construction or developers to come in and RAPE our little community. Along with the adjacent northern block off of Adam's ave which is all residential to have a 60 foot height allowance on any new construction that will be built. You are DESTROYING our residential neighborhood. There already is an extremely horrific parking problem in our area that the city has done absolutely nothing to provide parking. There were many people that evening that spoke out about the horrific traffic, problem, and parking problem that our little community already is experiencing. It was a fire commissioner that came in and spoke about the absolute devastation that a fire could produce in residence being able to safely even get out of the area. Our very narrow streets cannot handle the traffic that's already there and yet you want to bring in And unspeakable amount of construction to provide affordable housing in an area that cannot sustain the impact!! There are many other areas in San Diego that could withstand this type of development that has public transportation. This area does not and cannot sustain even what is here right now!! Our community wants the names of the individuals that came up with this plan!! We also want to know the amount of grant money that the city is supposed to get and producing this plan!! We want full accountability for every single dime that is gonna be spent and who is in charge of that!! We are 100% against this plan and we do everything in our power to fight against it!!	
I agree with critics of the draft Plan Update that the proposed density increases are not compatible with the historic nature of our communities, and, more importantly, that we must not allow or encourage significant increases in density without an enforceable commitment to -- and funding for -- amenities and infrastructure to support and increased density. Specifically, I feel strongly that any increased development in Kensington-Talmadge must be appropriate and in the correct areas, as outlined by the community planning group, and that the plan not take direct aim at single-family neighborhoods in our community. The City must address the lack of significant expansion of parks, schools, and other public facilities in the Kensington-Talmadge area, and guarantee that any legally enforceable up-zoning be paired with a required increase in necessary infrastructure and amenities.	Paul Krueger

Mid-City can add substantial housing without sacrificing its historic neighborhoods. El Cajon Boulevard and our other commercial corridors offer opportunities for mixed-use housing, neighborhood businesses, jobs, walkability and economic revitalization. We can build housing while protecting the planning principles that made TPEHD special in the first place. The yards matter. The trees matter. The setbacks matter. The streets matter. The spaces between buildings matter. The draft Mid-City Communities Plan itself recognizes the importance of historic preservation. On page 37, under Goals, it states: “Significant historical resources are identified, preserved and celebrated as part of Mid-City’s evolving community fabric.” “Educational opportunities and incentives support the ongoing maintenance and preservation of historic resources.” The City needs to put its money where its mouth is. Remove the proposed Townhome zoning (Residential Low 4) from the TPEHD and restore the area to single-family zoning (Residential Low 2).	Jan Taylor
Figure 2-1 shows new zoning for Mid Cities. Specifically for the Kensington neighborhood, the increased density allowed in the rough area between Alder and Madison to the north and south, and between Highway 15 and Van Dyke to the west and east is inappropriate. My understanding is that Adams Avenue in this area is already 75% over capacity. The plan calls for a huge increase in density along Adams Avenue (up to 109DU/AC I believe) and a large increase to the north and south (approximately 50DU/AC I believe). Adding more density around a street that is already 75% over capacity is a public safety problem. Much of Kensington is in the high fire zone. In case of fire, there would be no way to safely evacuate the residents to the north and directly south of Adams Avenue.	Melissa Hanna

Figure 6-3 shows current and proposed mass transit for Mid Cities. Based on the meeting of the board of the San Diego Metropolitan Transit System, it seems that bus and trolly service will be reduced by a third in the next few years. Figure 6-3 shows the proposed Trolley Purple Line and many bus routes that may never be inaugurated and may be eliminated due to budget constraints. The plan was partially created to align zoning with the provisions of SB79. The plan and resulting zoning will live for decades. If the transit plans are unknown and likely to result in less service, the integrated nature of the plan is destroyed. Decisions on density cannot be intelligently made without accurate long term funding commitments by the city and county to mass transit. Please do not go forward with the community plan without guarantees on the mobility map in Figure 6-3.	Melissa Hanna
Figure 7-1 shows current and proposed parks and public facilities for Mid Cities. While I know the residents of the Mid Cities would enjoy the new parks and public facilities, the plan only proposes them. The rezoning that will follow the approval of the plan will take place in short order, and we will live with it for decades. The parks and public facilities will only be built if funding allows. It is outrageous for the City to publish a plan, where residents of Mid Cities are expected to welcome higher density, while the City is under no obligation to fulfill its part of the plan. No update to the community plan should be made that increases density without specific concrete action by the City to fund the parks and public facilities proposed by the plan.	Melissa Hanna
I feel like the land use upzoning, specifically in Talmadge and Kensington, do not go far enough. From the presentation, it seems like most of the upzoning changes happening within these neighborhoods are the LEGAL MINIMUM due to SB79 implementation. I think the city should take a more proactive approach to increasing density, because it's what the city believes is good for itself, not because they are pretending their hands are tied behind their back by State Law. I don't see why not all of Kensington and Talmadge can at least be zoned for residential low 4. They have the road capacity (ample street parking), they are higher resource areas. They have access to high quality rapid transit. Talmadge is an aging population and I think more folks from all ages and background should be able to live there without being able to afford a million dollar house.	Anthony Simon
I think the City needs to be bold with it's Climate Goals. If this is truly an issue, we need to dream muchmuch bigger than what the plan currently holds.	Anthony Simon

Figure 6-2 I think I am mostly happy with the Bike network plans shown in the first draft. The planned changes that I am most excited about. 1. Bus bike Lane completed through El Cajon Boulevard. -- The current bike connection situation East of 44th Street is appalling. From 44th to 54th there are no bicycle facilities at all, despite serving Hoover Highschool and the YMCA. Once it reaches 54th street heading east, only sharrows are present on ECB, which is very high speed and high volume traffic. It is just not safe. I am in full support of this change. There is currently no great method for heading East from Kensington,Talmadge, Little Saigon. 2. The Cycle Tracks down Fairmont and 43rd. - Amazing. Currently there are no good north south bike routes through city heights. I'm a big fan, especialliy considereing the general increase in density along those corridors near ECB and University Ave. Negatives: 1. I think it's disappointing Adams will remain a Class III, enhanced or not. Again, very high traffic area with lots of curb cuts leading into buisnesses. Paired with sometimes one lane of traffic, the chance for Cyclist-motorist conflict points are high. Considering thee is a high concentration of bars along Adam's, it seems irresponsible and extremely dangerous to think Class III is the way forward. If I want to get from one spot to another on Adams, I never cycle through Adams, I always make my way to a side street because Adams simply does not feel safe to cycle on in it's current state and it's projected state as well. Remove the street parking, build a bike lane.	Anthony Simon
Figure 6-1 I am happy to see the Kensington Canyon Trail along the outskirts of the neighborhood. This seems like a good solution to the desire for green space and nature within the neighborhood. I would like to see continuous sidewalks from Fairmount & Meade all the way to the Grantville Trolley Station. This is the closest trolley station to our neighborhoods, and its a huge shame the only way to get there is by bike, bus, or car, or to risk it walking along Fairmount's bike lanes which is not safe for the cyclists or the pedestrians.	Anthony Simon
I am extremely worried about fire safety in a denser Kensington. In the part of Kensington that I live in, there are only two roads in and out, and they are both narrow and lined with cars. If we had a canyon fire I don't see how residents could evacuate and fire trucks enter the area. It is a situation waiting to be a disaster, even in the best of times. What is the plan for fire? I strongly believe this issue needs to be addressed before the city proceed with higher density plans.	Janice Peterson

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Figure 7-1 shows current and proposed parks and public facilities for Mid Cities. While I know the residents of the Mid Cities would enjoy the new parks and public facilities, the plan only proposes them. The rezoning that will follow the approval of the plan will take place in short order, and we will live with it for decades. The parks and public facilities will only be built if funding allows. It is outrageous for the City to publish a plan, where residents of Mid Cities are expected to welcome higher density, while the City is under no obligation to fulfill its part of the plan. No update to the community plan should be made that increases density without specific concrete action by the City to fund the parks and public facilities proposed by the plan.	Patricia Serrano

To ensure that growth is truly equitable, the Plan should include strong and enforceable affordable housing protections. This includes no-net-loss policies, replacement of any demolished or converted affordable homes at similar affordability levels, stronger anti-displacement measures, preservation of naturally occurring affordable housing, deeper affordability requirements, family-sized affordable homes, and clear accountability standards.	Patricia Serrano
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"Request that SANDAG study the Teralta Neighborhood Park Expansions and that the City of San Diego study an Enhanced Infrastructure Financing District to provide partial funding to the Teralta Neighborhood Park Expansions. We support the Draft Plan's inclusion of the Teralta Neighborhood South and Teralta Neighborhood North Expansions. These expansions to Teralta Park have the potential to transform the surrounding area that has endured significant negative impacts from SR-15. However, other community plans have included freeway caps and seen little to no progress. For example, the Downtown Community Plan has included a freeway cap over I-5 for 19 years. In order to ensure this does not occur, tangible first steps must be taken. A proposed freeway cap over I-5 in Barrio Logan received $2.5 million for a study. A similar study should be pursued with SANDAG as the lead agency, in close coordination with Caltrans District 11. Potential funding sources for the project should be studied by the City of San Diego. We also believe that the city should complete the air and noise study as part of the Mid-City plan update and include an alternative with a fully built-out SR-15 freeway cap. An Enhanced Infrastructure Financing District should be studied with considerations for potentially extended timelines similar to those granted to LA County with up to 75-year time periods. We recommend 10% of the funds from a future EIFD be dedicated to affordable housing and 10% of the funds be dedicated to public transportation and micromobility infrastructure. The remaining 80% should be dedicated to servicing the debt for the construction of the Teralta Park extensions. Add parks to Talmadge, which has historically been park poor"	Anar Salayev

Implement the City's ""Class IV First"" policy and plan for transit-priority lanes on frequent bus and Rapid corridors The final plan should establish an all-ages-and-abilities standard for the bicycle network and implement the City's adopted ""Class IV First"" approach. The draft identifies high bicycle demand and significant traffic stress along El Cajon Boulevard, University Avenue, Euclid Avenue, Adams Avenue, and other major corridors. The final plan should consistently provide physical protection where traffic volumes and speeds make painted or shared-lane facilities inappropriate. This is especially important on Adams Avenue, where a Class III Enhanced facility is not sufficient for the traffic volumes and speeds found along the corridor. The Planned Mobility Map should instead identify a Class IV protected facility between I-805 and SR-15. A successful bicycle network should also be measured by whether people can safely and comfortably reach schools, jobs, commercial districts, parks, transit stations, and neighboring communities, rather than simply by the number of bikeway miles shown on a map. Recent regional research has similarly identified safety, connectivity, and incomplete networks as major barriers to bicycling. The urgency of these investments is reinforced by Mid-City's collision history. From 2015 through September 2026, El Cajon Boulevard, University Avenue, Euclid Avenue, and Fairmount Avenue experienced approximately 2,929 injury or fatal collisions, 3,828 injuries, and 37 deaths. At least 564 pedestrians and 194 bicyclists were injured or killed. Among fatalities where travel mode was identified, approximately 80 percent were people walking or bicycling. El Cajon Boulevard and University Avenue stand out in particular: El Cajon Boulevard experienced approximately 1,051 injury or fatal collisions and 20 deaths, including at least 15 pedestrian fatalities. University Avenue experienced approximately 1,068 injury or fatal collisions and 10 deaths, including at least 252 pedestrians and 86 bicyclists injured or killed. The final plan should identify El Cajon Boulevard, University Avenue, Euclid Avenue, and Fairmount Avenue as priority safety and multimodal investment corridors and connect their implementation directly to the Mobility Master Plan and future capital programming.	Anar Salayev

"Plan additional housing around existing and planned high-quality transit and bicycle infrastructure Mid-City is positioned to become one of San Diego's strongest transit-connected communities. The area is already served by the Rapid 215 and Rapid 235, with plans to receive additional high-quality service through Rapid 210, Rapid 256, Rapid 295, Rapid 625, Rapid 688, improvements to Routes 13 and 955, and the proposed Purple Line. The final plan should more deliberately align land use with this transit investment by creating additional transit-focused housing hubs and by increasing housing capacity along major transit corridors, particularly El Cajon Boulevard, University Avenue, College Avenue, 54th Street, Euclid Avenue, Fairmount Avenue, and near the SR-15 transit stations. Land uses surrounding planned Rapid stops should be zoned to support enough residents, jobs, and destinations to make these investments successful. This is especially true for areas around the Rapid 625 and Rapid 210—both planned near-term projects—with major stops along most of University Avenue, parts of 54th Street, and Euclid Avenue, and other major transfer points where multiple frequent routes will intersect. Land-use planning should also recognize that successful transit requires more than designating routes on a map. These corridors need infrastructure that allows buses to operate quickly and reliably. The final plan should therefore pair additional housing with commitments to transit-priority improvements, including bus lanes, transit signal priority, improved stations, and safe walking and bicycling connections to transit. Efforts should also be made to create new regional hubs to align with many peer plan updates. Zoning for such hubs has been included along Fairmount at El Cajon and University; however, many other high-quality transit hubs were not included. The intersection of Euclid and Federal, for example, is planned to have a Rapid 625 stop, which is a project in advanced planning, as well as a potential Purple Line stop. Another example is the two SR-15 Busway stops, both of which serve as major transfers and transit hubs. Increase housing opportunities in moderate and high resource areas.	Anar Salayev

While El Cajon Boulevard and Adams Avenue were significantly upzoned, along with blocks directly adjacent to Adams Avenue and the block north of El Cajon Boulevard, we believe this upzoning is less than acceptable when neighboring parts of City Heights have been significantly upzoned through this plan. City guidance is to prioritize adding more housing to higher resource areas, and this should be followed in the Mid-City Plan update. More people should be able to live in areas with lower poverty rates, better access to education, and greater proximity to jobs. These areas in the Mid-City plan area are more similar than different to their counterparts south of El Cajon Boulevard and should be zoned accordingly. Adopt zoning that is consistent with the San Diego City Council-adopted SB 79 plan fire map. The Mid-City plan update area includes 3 qualifying SB 79 transit stops according to SANDAG, and overlapping areas from 2 neighboring transit stops in North Park. The city planning department has fulfilled SB 79 requirements in the plan area except in the city's Very High Fire Severity Zone area. City staff had promised that areas that fall under SB 79 would have their zoning implemented in plan updates, and that implementation should be congruent with the proposed City SB 79 policy regarding which properties would be included or excluded from SB 79. Under the City of San Diego's rules, a property within a Very High Fire Severity Zone is exempt from SB 79 only if it is accessible via a single access point. This means that even if a property were to fall under a Very High Fire Severity Zone, it would only be exempt if it is on a cul-de-sac. Therefore, we believe the city should adopt SB 79-equivalent zoning in two missing areas in Kensington and Talmadge. Keep Complete Communities as it currently functions throughout San Diego. Complete Communities plays an important role in making San Diego a uniquely pro-housing city within the state of California. While SB 79 has some overlap with Complete Communities, there are key differences that go beyond density that cannot be ignored. Specifically, projects that use Complete Communities are granted streamlined ministerial approval. Without this many affordable housing projects and projects with a mix of affordable and market rate housing would not have been built in the parts of San Diego that often need diverse housing opportunities the most.	Anar Salayev
I would like to see more sense housing in the Element. Specifically, I want more housing near transit stops and hubs. I also think it would be good to see more of that dense housing fairly distributed across high and medium resource areas. Mid-City has some of the best public transit in San Diego, and it deserves more housing so more people can access that transit in an affordable way.	Grey Crawford

To ensure that growth is truly equitable, the Plan should include strong and enforceable affordable housing protections. This includes no-net-loss policies, replacement of any demolished or converted affordable homes at similar affordability levels, stronger anti-displacement measures, preservation of naturally occurring affordable housing, deeper affordability requirements, family-sized affordable homes, and clear accountability standards.	Lucky Aden
My name is Lucky Aden and I'm a resident of City Heights and I live along University Ave, Figure 5-4 says to consider alternative options to limit Lea St extension to bike/pedestrian access-only. We are requesting in the Second Draft to adopt the bike/ped-only treatment of Lea Street as the Plan's FIRM recommendation. As a community member, I want more pedestrian and bikeway opportunities, free of the dangers of cars, for our elders and children. We do not want more cars through the Global Village site. We also believe that the park will be safer for kids and elders if we prioritize pedestrian access. Many community members have raised concerns about the frequent pedestrian and vehicular accidents that have led to multiple deaths over the years. As a result, our communities have repeatedly expressed the need for more pedestrian and bike safety. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site include safe signalized pedestrian crosswalks on University Avenue and 54th Street, consistent with the Plan's own Vision Zero and Complete Streets goals. Please include a word bubble that says "safe, signalized crossings on University Avenue and 54th Street" in Figure 5-4.	Lucky Aden
The city has made it a mission to prioritize high resource areas for density increases, and I do not think this plan fully reflects that. We should be taking advantage of the infrastructure, parks, and other amenities of these areas and concentrating density there compared to already disenfranchised areas. Furthermore, any upzoning should anticipate future BRT and rail projects coming to the Mid-City neighborhood, including the Rapid 625 and 688, as well as the eventual Purple Line. Adding housing in expectation of these transit lines will benefit everyone.	Guthre Leonard

I think this plan is too conservative when it comes to planning for protected bike lanes. Considering the density of the Mid-City neighborhood, this is a priority. With that in mind, I believe every major corridor, including El Cajon Boulevard, University Avenue, Euclid Avenue, and Adams Avenue, should have high quality, concrete or parking separated lanes. Just like roads, bike lanes are only as useful as the network they are a part of. Be bold in their planning, and people will use them.	Guthre Leonard
You propose to rezone Euclid , south of Landis to Redwood (paper street) from residential to commercial. We have had new residential built under the current zone which requires residential but makes commercial optional. The Euclid Avenue Revitalization Action Planning came about because the city planned to change the zoning from residential to commercial and the community was against it then as well. We don't get neighborhood serving commercial on Euclid we get problem properties that we have to work with code compliance to remove because they refuse to comply with code compliance. It's inappropriate to put straight commercial across from the Islenair Historic District. They are not compatible uses and would change the character of the neighborhood. Please change the proposed commercial back to residential so we can continue to revitalize Euclid Avenue.	Patty Vaccariello
I'm not sure what Elemt talks about Green Corridors but Euclid from Home to El Cajon should be a Green Corridor . We've planted a large number already south of Isla Vista Drive and should continue that north to El Cajon by using one continuous tree to create a theme through the corridor. Euclid is one of two north/south streets thru City Heights. Let's show it some love!	Patty Vaccariello
Kensington area needs to becoming historic in order to preserve its special character and the feeling of a village.	Mr and Mrs Gaucher
Kensington is an area in the high fire zone and there are few roads to exit the area. The roads are narrow and made narrower with parked cars. On Hilldale Road, there will be some tiny ADUs added to an already very congested street. Where are the cars going to park? Where is the safety concern in case of fire? How can we all evacuate safely and quickly? Also, the increase in density on Adams Avenue will create more difficulties in parking and already vastly over-capacity creates an even greater public safety concern. During the meeting, it was mentioned that buses and transit systems are going to be reduced due to city budget constraints. This doesn't make any sense.	Mr and Mrs Gaucher

My name is Abdullahi and I'm a resident of City Heights, and I live along University avenue, Figure 5-4 says to consider alternative options to limit Lea St extension to bike/pedestrian access-only. We are requesting in the Second Draft to adopt the bike/ped-only treatment of Lea Street as the Plan's FIRM recommendation. As a community member, I want more pedestrian and bikeway opportunities, free of the dangers of cars, for our elders and children. We do not want more cars through the Global Village site. We also believe that the park will be safer for kids and elders if we prioritize pedestrian access. Many community members have raised concerns about the frequent pedestrian and vehicular accidents that have led to multiple deaths over the years. As a result, our communities have repeatedly expressed the need for more pedestrian and bike safety. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site include safe signalized pedestrian crosswalks on University Avenue and 54th Street, consistent with the Plan's own Vision Zero and Complete Streets goals. Please include a word bubble that says "safe, signalized crossings on University Avenue and 54th Street" in Figure 5-4.	Abdullahi
I support the addition of more bike and pedestrian friendly pathways and regularly use both currently, however I think the current plan of adding bike paths the major car traffic roadways does not facilitate easy transit for cars or cyclists. Please consider prioritizing bikeways that are adjacent to main streets rather than attempting to have main roads such as University, El Cajon blvd, 30th street etc. incorporate bikes into heavily trafficked roads. As a cycling I strongly prefer biking along streets like Landis st and only passing through main roads at connection points. Additional north-south bike lanes are needed and would be helpful at chamoune ave, and 35th street. Developing more connected bike infrastructure off of major roads with heavy car traffic is safer for cyclists as well as allowing for better flow of traffic on main roads.	Hannah Campi

Strongly support more tree cover, green spaces, and natural design in this region. The city should work with residents to accelerate this effort by providing incentives for property owners to redevelop their parkways in a way that aligns with this effort. For example, property tax credits could be offered to residents who improve parkways in a manner aligned with the plans goals. This could save money, decrease impacts of major construction, give residents options over design, and accelerate meeting goals that could otherwise take decades to fully realize. The city should also coordinate with west coast arborists who are marinating trees recently planted through the USDA street greening program and otherwise work to align with other efforts to prevent ongoing construction for consecutive projects that could have been completed in tandem. There are many streets in this area that have been repaved over and over in the same few years due to disparate construction projects in the same area that are not coordinated with each other. It is frustrating to deal with ongoing construction and see freshly paved streets be torn up when others with significant damage are not being repaired. Realizing that these are not all city efforts, the city should work to develop a database of upcoming projects and align major construction so the same areas are not subject to noise, traffic dust etc for years at a time.	Hannah Campi
As noted in the plan, the city heights area is one of the older communities in San Diego. Surrounding neighborhoods such as Kensington and South Park benefit from Mills Act designation, but the same historic preservation incentive is not available to residents of city heights. Expanding Mills act or similar incentives for historic preservation would incentivize private improvement to properties in the area as well as benefiting residents who have been deprioritized by city development until recently.	Hannah Campi
Please consider revising the definitions of low, mid and high density development. None of the images presented in figure 2-1 represent what I would consider low density, and everything above Medium 4 looks very similar and are all what I would consider high density. Recognizing that the definition is based on occupancy rates, I do not think the plan appropriately describes various housing density levels, particularly when in combination with other areas of the plan that advocate for green space and overall community development. The push for higher density housing is not appropriate for this area. The plan should lower the threshold for what is considered medium and high density and include some plan for legitimacy low density housing that is consistent with other goals and the surrounding neighborhoods. This area is already extremely high density relative to surrounding communities and needs to prioritize walkability, green spaces, and development that is consistent with the historic architecture of the region. New developments should be incentivizes to focus on one to two story multi family buildings with shared courtyard space that minimizes congestion and contributes to the plans other goals of shared community spaces, sustainability and historic preservation.	Hannah Campi

To ensure that growth is truly equitable, the Plan should include strong and enforceable affordable housing protections. This includes no-net-loss policies, replacement of any demolished or converted affordable homes at similar affordability levels, stronger anti-displacement measures, preservation of naturally occurring affordable housing, deeper affordability requirements, family-sized affordable homes, and clear accountability standards.	Abdullahi Abdirahman
To ensure that growth is truly equitable, the Plan should include strong and enforceable affordable housing protections. This includes no-net-loss policies, replacement of any demolished or converted affordable homes at similar affordability levels, stronger anti-displacement measures, preservation of naturally occurring affordable housing, deeper affordability requirements, family-sized affordable homes, and clear accountability standards.	Abdi Ali
Affordable Housing	Trinh Le
Figure 5-4 says to consider alternative options to limit Lea St extension to bike/pedestrian access-only. We are requesting in the Second Draft to adopt the bike/ped-only treatment of Lea Street as the Plan's FIRM recommendation. As a community member, I want more pedestrian and bikeway opportunities, free of the dangers of cars, for our elders and children. We do not want more cars through the Global Village site. We also believe that the park will be safer for kids and elders if we prioritize pedestrian access. Many community members have raised concerns about the frequent pedestrian and vehicular accidents that have led to multiple deaths over the years. As a result, our communities have repeatedly expressed the need for more pedestrian and bike safety. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site include safe signalized pedestrian crosswalks on University Avenue and 54th Street, consistent with the Plan's own Vision Zero and Complete Streets goals. Please include a word bubble that says “safe, signalized pedestrian crosswalks on University Avenue and 54th Street” in Figure 5-4.	Trinh Le
We need proper bus lanes in City Heights. Not just for the 215 but planned routes like the 625.	Leif Gensert

I support the KTPG Alternative Plan, which: - focuses new density on and near transit and commercial corridors, rather than deep within established neighborhoods. - leaves existing residential zoning intact. ADUs, SB 9 and other state and local programs already allow substantial additional housing in these areas. The real displacement of small businesses by a development must be addressed. Making a promise that they will try to help them find another place does not address the issue of the difficulty of moving an established successful business means a loss of customers to the point of losing an important community resource. Many small businesses can't afford the cost of relocation (staff, square footage, equipment, etc).	Dawn Anderson
This plan must recognize and protect potential historic districts and historic resources, and recognizes existing State and National historic districts locally.	Dawn Anderson
Even though the city recognizes that impervious surfaces "can" contribute to localized flooding, water quality and heat islands; that should be changed to "will" contribute to these issues. The stormwater infrastructure is failing at best. It makes no sense to add large impervious surfaces to impact the already existing clogged stormwater channels. It ends up no longer doing what it was intended to do. The stormwater channel that runs along the west side of Fairmount Ave north of Meade Ave is clogged. When it rains, the water flows out of the channel up to the embankment along Fairmount and is eroding the embankment. Being that Fairmount is a major road, this needs to be cleared enough for water to flow. The Aldine Drive storm water channel from Monroe Ave north to Fairmount also is in need of repair for safe passage of the thousands of daily trips logged each day. With large developments, the heat vulnerability increases. Developments must be required to add more vegetation (native bushes, trees). So far the developments have not included enough vegetation to counteract the rising heat and filter air particulates. Rising heat and degraded air quality result in resident and community health issues.	Dawn Anderson
This plan must require infrastructure to accompany growth, including parks, libraries and community facilities.	Dawn Anderson

"This plan must require that the bike lanes being installed be make sense, safe and maintained. Bikes and buses should never be in the same lane. Part of the installation should include repaving the street for safe riding. The plan must require maintaining safe evacuation routes in the event of a fire or other emergency. Follow the code for street width requirements for emergency vehicles. Many of the streets are too narrow. The plan must require the Aldine Drive, Euclid and Monroe intersection to be reconfigured for safety of all pedestrian, bikes and cars. "	Dawn Anderson
This plan must require infrastructure to accompany growth, including parks, libraries and community facilities. The proposed "parklet" for Talmadge is on a very small spot at the top of a hillside storm drain. Physical site visits must be done to properly evaluate park space (Talmadge currently has zero park points).	Dawn Anderson
To ensure that growth is truly equitable, the Plan should include strong and enforceable affordable housing protections. This includes no-net-loss policies, replacement of any demolished or converted affordable homes at similar affordability levels, stronger anti-displacement measures, preservation of naturally occurring affordable housing, deeper affordability requirements, family-sized affordable homes, and clear accountability standards.	Muna Shegow
My name is Muan Shegow and I'm a resident of downtown , and I live along J St , Figure 5-4 says to consider alternative options to limit Lea St extension to bike/pedestrian access-only. We are requesting in the Second Draft to adopt the bike/ped-only treatment of Lea Street as the Plan's FIRM recommendation. As a community member, I want more pedestrian and bikeway opportunities, free of the dangers of cars, for our elders and children. We do not want more cars through the Global Village site. We also believe that the park will be safer for kids and elders if we prioritize pedestrian access. Many community members have raised concerns about the frequent pedestrian and vehicular accidents that have led to multiple deaths over the years. As a result, our communities have repeatedly expressed the need for more pedestrian and bike safety. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site include safe signalized pedestrian crosswalks on University Avenue and 54th Street, consistent with the Plan's own Vision Zero and Complete Streets goals. Please include a word bubble that says "safe, signalized crossings on University Avenue and 54th Street" in Figure 5-4.	Muna Shegow

To ensure that growth is truly equitable, the Plan should include strong and enforceable affordable housing protections. This includes no-net-loss policies, replacement of any demolished or converted affordable homes at similar affordability levels, stronger anti-displacement measures, preservation of naturally occurring affordable housing, deeper affordability requirements, family-sized affordable homes, and clear accountability standards.	Rahmo Abdi
My name is Rahmo Abdi and I'm a resident of city heights , and I live along (Street Name), Figure 5-4 says to consider alternative options to limit Lea St extension to bike/pedestrian access-only. We are requesting in the Second Draft to adopt the bike/ped-only treatment of Lea Street as the Plan's FIRM recommendation. As a community member, I want more pedestrian and bikeway opportunities, free of the dangers of cars, for our elders and children. We do not want more cars through the Global Village site. We also believe that the park will be safer for kids and elders if we prioritize pedestrian access. Many community members have raised concerns about the frequent pedestrian and vehicular accidents that have led to multiple deaths over the years. As a result, our communities have repeatedly expressed the need for more pedestrian and bike safety. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site include safe signalized pedestrian crosswalks on University Avenue and 54th Street, consistent with the Plan's own Vision Zero and Complete Streets goals. Please include a word bubble that says "safe, signalized crossings on University Avenue and 54th Street" in Figure 5-4.	Rahmo Abdi
What are the planned mobility improvements for Poplar Street? Due to traffic volume and speed on this street, any traffic calming measures such as a stop sign, cross walks, bulb outs would greatly be appreciated to reduce safety risks.	Claudia Watts
In general, Class IV bike lanes should be prioritized. These are the only kinds of bike lanes that the vast majority of the public feel safe enough to use. Specifically, there is no safe Class IV corridor running east-west in the plan. Ideally, there should be Class IV lanes on Adams, ECB and University. Additionally, there needs to be multiple safe north-south routes to form a network. For example, by installing Class IV lanes on 35th st and on Euclid.	Jason Bryslawskyj

My name is Mayra Barrera and I'm a resident of Southcrest, and I live along 35th Street, Figure 5-4 says to consider alternative options to limit Lea St extension to bike/pedestrian access-only. We are requesting in the Second Draft to adopt the bike/ped-only treatment of Lea Street as the Plan's FIRM recommendation. As a community member, I want more pedestrian and bikeway opportunities, free of the dangers of cars, for our elders and children. We do not want more cars through the Global Village site. We also believe that the park will be safer for kids and elders if we prioritize pedestrian access. Many community members have raised concerns about the frequent pedestrian and vehicular accidents that have led to multiple deaths over the years. As a result, our communities have repeatedly expressed the need for more pedestrian and bike safety. We also ask that the Second Draft confirm that any new pedestrian and bicycle connections through the Chollas Triangle site include safe signalized pedestrian crosswalks on University Avenue and 54th Street, consistent with the Plan's own Vision Zero and Complete Streets goals. Please include a word bubble that says "safe, signalized crossings on University Avenue and 54th Street" in Figure 5-4.	Mayra Barrera

use designation of Residential Medium 3 in this area. I also do not support this designation In the wider neighborhood between Adams and Madison Avenues, from Terrace Drive to Van Dyke Avenue. This area is a mix of predominantly single-family homes with some small multi-family apartment complexes. Most of the SF homes are approximately 100 years old. The neighborhood is currently in process of applying for designation as an historic district. This neighborhood is often cited as exemplary of urban design principles: walkable, distinct architectural style (Spanish Colonial Revival and Craftsman), front porches with "eyes on the street". Replacing the current land use designation and zoning with those proposed in the first draft would kill this neighborhood. The proposal disregards the current and proposed community plans' historic preservation polices. My street is also located within the Fire Hazard Severity Zone. My particular street has a "kink" in the layout of the street; it is not a straight street. It is not an appropriate evacuation route if there is a fire emergency. Traffic would be hindered along this route. Increasing density along this street would be foolhardy. While I support increasing density and upzoning in Kensington to achieve more housing opportunities, I do not support the wholesale destruction of the character of the community proposed by the draft plan. I support the Kensington-Talmadge Community Planning Group's proposed alternate plan which achieves increased housing opportunities while rationally recommending increased density in appropriate areas (such as on properties located immediately adjacent to Adams Avenue. In summary, I believe the proposed land use changes in Kensington are inappropriate and not responsive to true growth needs, and that these proposals are taking a chain saw approach to addressing housing needs when a fine scalpel approach would be more sensitive and appropriate. Please consider the Planning Group's recommended alternative.	Howard Greenstein

"Per the Community Plan/General Plan Policies Table 3-1 regarding identifying and preserving historic communities: Boundaries of proposed and existing historic districts were not respected in the zoning decisions. Kensington Park, south of Adams Avenue, contains many of the oldest, (1910- 16) original homes in Kensington. The current draft of the Mid-City Community Plan singles out the one block south of Adams Avenue, from Adams Ave to Madison Ave, and Terrace Drive east to Van Dyke, as an appropriate area to build the highest density/tallest (6- 8 story) structures. Not only would this destroy the original aesthetics of the neighborhood, but the potential increase in population would cause a quagmire of traffic, and a parking nightmare, especially as there is currently no requirement for new multi-story construction to provide parking. Traffic on Adams Avenue is already thousands of vehicles over the proposed capacity, and in an emergency would be a deadly grid-lock. I am aware that compliance with state SB79 is required. The Kensington-Talmadge Planning Group submitted an alternative plan that needs to be re-examined, because it appears the City planning committee disregarded logical, sensible alternatives that do in fact satisfy SB79, as well as the numerous other requirements. The existing City and State bonus development programs have not been included or considered in the Mid-City draft, including the many ADU's that have been built all over Kensington, already increasing and fulfilling our contribution to the density requirement. Please go back to the drawing board and adjust the Mid-City plan to lower the impact on our historic neighborhood, creating a more equitable zoning solution. Please do not try to solve the housing problem by jamming the majority of potential new residents into one block of 6- 8 story structures in the oldest historic part of Kensington. "	Leslie Padilla
I oppose the Draft Plan. I support the KTPG Alternative Plan which: 1) focuses on new density on/near transit and commercial corridors, 2) leaves exiting residential zones intact, 3) requires infrastructure to accompany growth, 4) recognizes and protects historical district, 5) ensures a place for first-time homebuyers, families, and seniors, 6) maintains safe evacuation routes.	Natalie Toriello
I oppose this plan. I support the KTPG Alternative Plan.	Natalie Toriello

"Dear Mid-City Planning Team, I am writing to express my strong support for prioritizing abundant housing and dedicated bus infrastructure in the Mid-City Communities Plan Update. To ensure Mid-City remains an affordable, vibrant, and sustainable community, I encourage the City to upzone key transit corridors and commercial hubs to allow for significantly more multi-family housing, including deed-restricted affordable units and middle-income housing options. Expanding dedicated, transit-only bus lanes along high-frequency routes such as El Cajon Boulevard and University Avenue will improve transit reliability, reduce travel times, and encourage sustainable commuting choices. Pairing these transit improvements with protected bike lanes, wider sidewalks, and safer crosswalks will foster a more walkable, climate-resilient, and inclusive Mid-City for all residents. Thank you for considering these priorities as you refine the plan update.	Tran Dorthy
We want to preserve one of the last of the historical charming neighborhoods -Kensington/Talmadge- in San Diego. As a property owner we do not want to see overpopulated 6 or 8 story multifamily apartment buildings take over our neighborhood in the name of greed. We don't want to get rid of the beautiful history as once it's gone its gone. Also, we are very concerned about safety, the congestion this would cause if there was a fire or other disaster it seems there was not a concrete plan for evacuation. This needs to be looked into further and provide us a plan. The boundaries of existing and proposed historical districts were not included in the draft plan, nor were they respected in the City's zoning decisions.	Alejandro Gonzalez
The proposed SB79 Alternative Plan submitted by the Kensington-Talmadge Planning group was mentioned or incorporated into the daraf plan. The Alternative Plan complies with SB79 yet limits the impact to single-family homes.	
https://timesofsandiego.com/opinion/2026/09/28/hidden-cost-upzoning-constant-uncertainty/ This op-ed addresses the uncertainty residents are being asked to live with as a result of the proposed increase in density within established single-family neighborhoods. Residents are already adjusting to the uncertainty and impacts created by expanded ADU development. Why add another layer of stress and uncertainty when it is not necessary? There is a better alternative. Focus new housing and investment along El Cajon Boulevard, where substantial opportunities for redevelopment already exist, rather than creating unnecessary uncertainty within established neighborhoods.	Laura Henson

"This community plan update does a LOT for land use, and I am grateful to see how much is being proposed. However, when you take a step back and consider all of the infrastructure investment planned for the region, the proposed land use does not actually fully take advantage of it, nor does it necessarily spread the load between high, medium, and low resource areas. The main area in this plan that I believe to be deserving of the highest intensities of development is the quadrangle bounded by El Cajon Blvd to the north, Fairmount Ave to the east, University Ave to the south, and SR15 to the west. El Cajon Blvd has Rapid 215 and portions of bus lanes that help facilitate it. Fairmount Ave has the highest ridership bus in the system (13) and the planned Purple Line rail. University Ave has routes 7 & 10 and plans for Rapid 210. SR15's busway has two things going for it: high quality bus routes/infrastructure and the cap. The SR15 busway currently hosts Rapid 235, but will have Rapids 265 and 295 as well. With all of this transit infrastructure, there are two sets of east-west corridors and two sets of north-south corridors carrying passengers to all corners of this city quickly and efficiently. But then there's also the cap. The SR15 cap will kill two birds with one stone: stitches together neighborhoods while simultaneously making the freeway adjacent area go from not desirable to cherished neighborhood possession. To ensure that our infrastructure investment doesn't go to waste, the city NEEDS to zone this quadrant as dense as possible. In fact, I would even ask the city to consider CC-3-11 zoning. Beyond this dense core area, there are a few other asks I have. There are 3 major east-west arterials, but not really a north-south main street. Streets like 35th St, the capped SR15, Fairmount Ave, Euclid Ave, northern Winona Ave, northern 54th St, and northern College Ave should be planned around as main streets similar to the east-west arterials. They should all for the most part have dense Community Commercial land uses fronting the street (mostly CC-3-10) and very dense residential adjacent.	

Federal/Euclid is also a very overlooked area. It will definitely have a high quality rapid transit stop in the near term Rapid 625 and potentially a Purple Line rail station as well. We should treat this station area seriously, and upzone significantly around it. Breakdown by corridor/area: 35th St: With the high quality bike infrastructure, there should be CC 110-218 fronting the entire street between Wightman and Meade, with gradual transitions in the north and south to step down with CC 74-109, especially gradual toward Adams Ave. Residential intensity should be Residential 74-109 in the blocks surrounding the Community Commercial. Adams Ave: Consider increasing density at the intersection with 35th St. Normal Heights: With the density, transit and bike acessibility of Adams and El Cajon Blvds and the relatively small distance between the two, especially with 35th St as a new main street, an approprtiate gradual step down in Normal Heights is actually a far denser zoning than this map proposes. It should be Residential Medium 55-73 at least, with a modest amount of Residential Medium 74-109, especially nearest the corridors. SR15: existing zoning is decent, but there is a ways to go if the city is serious about maximizing return on investment from infrastructure. The cap and high quality transit in the area will make this corridor one of the most desirable areas to live in in the whole city. Density should match, and be Urban Village, CC 110-218 (or even 290 if CC-3-11 could be in play), or Residential 146-218 anywhere fronting SR15, with incredibly gradual stepdowns in the surrounding blocks as this is already and will continue to be one of the most urbanized areas in the city. Fairmount Ave: Vast expansion of CC 110-218 (or 290) to allow for huge mixed use developments. With the 13 and the future Purple Line, this corridor hosts literally the most ridden transit infrastructure in the city, and the housing stock should absolutely reflect that by being as dense as possible.	Sam Borinsky

Euclid Ave: should become a north-south main street and therefore have CC 110-218 zoning around and extending from intersections with El Cajon Blvd and University Ave, with CC 74-109 as a step down and CC 45-73 well south of University. There should also be some Residential Medium 55-73 fronting the already proposed CC 45-73 to ensure gradual step downs. The parcels around Euclid/Home should ALL be upzoned to CC 74-109. Same with Home/Fairmount, and denser residential zoning around it to ensure gradual transitions. Winona Ave: As one of the only areas that is simultaneously not low resource or in the high risk fire zone, the street between Monroe and Orange should be fronted with CC 110-218 and then gradually step down. North and south of those intersections it should briefly step down to CC 74-109 before turning fully residential in nature and continuing to very gradually step down. This helps with the equity of upzoning, as we don't just want low resource areas to upzone, we want to ensure EVERYONE does. 54th St: Densify along the street. East of Colina Del Sol Park there should be Residential Medium 74-109 zoning. South and southeast of the park there should be CC 110-218 zoning, with an Urban Village instead of Community Village in the Chollas Triangle. Around Redwood St boosting the Community Commercial there to CC 45-73 and then actually implementing some gradual step down transitions would help as well. Finally, the intersection of Federal/Euclid/54th. This whole area is host to some of the best patronized buses in the city, with plans for the transformative near term Rapid 625, and plans for a potential Purple Line rail station. Due to this, this entire area should seriously aim to maximize on this infrastructural investment, and upzone densely. CC 110-218 and Urban Village zoning seem applicable, with step downs into the residential neighborhoods to ensure that there is transitionary zoning. College Ave: CC 110-218 instead of 74-109 and Urban Village zoning too. Ensure stepdowns are gradual.	Sam Borinsky

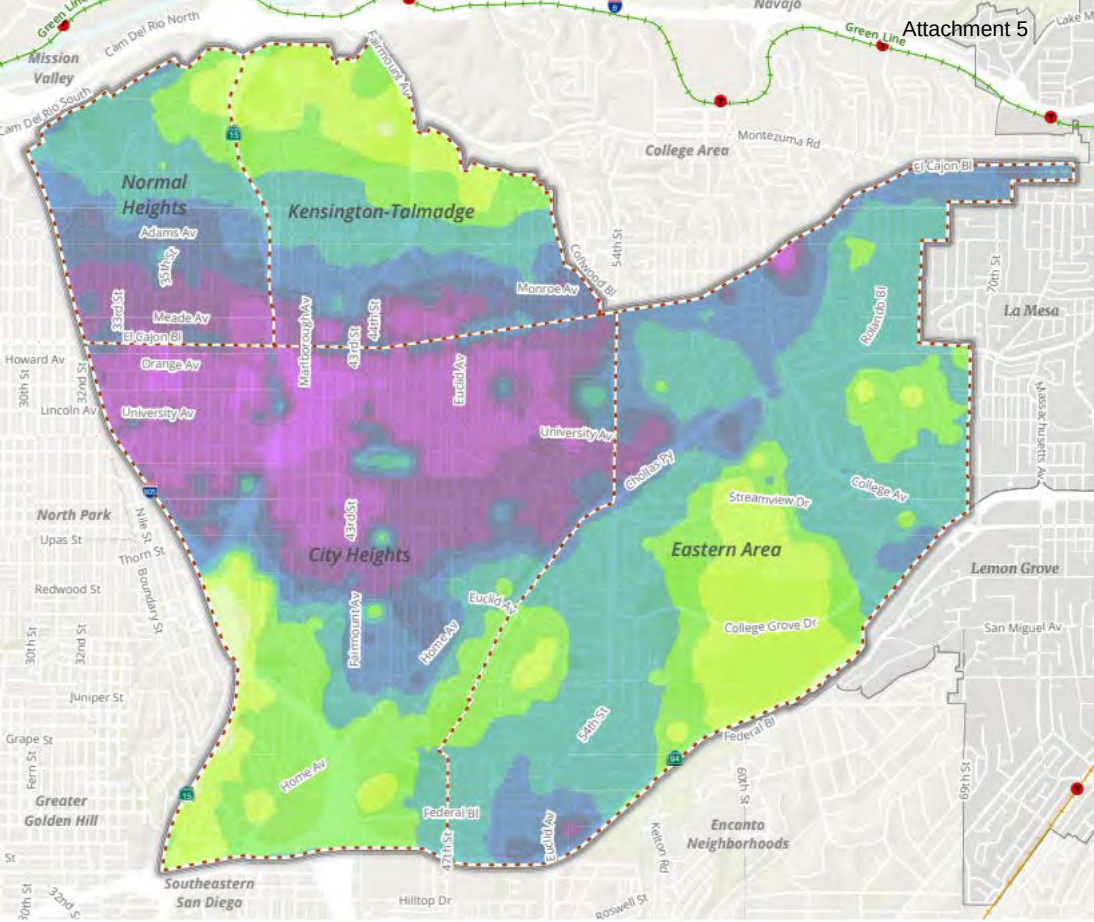
El Cajon Blvd: Except where matching College Area Plan, fronted with CC 110-218 (or even CC-3-11's 290 if possible). Stepdowns should be gradual, and residential intensity adjacent to the CC should be at least Residential Medium 74-109 if not denser. Consider Urban Villages where intersecting with a north-south main street as described above and where parcel sizes allow. Push CC 110-218 further from the street frontage between SR15 and Fairmount Ave. University Ave: Increase density to CC 110-218 from Euclid (inclusive) westward to the border with North Park. Push CC 110-218 further from the street frontage between SR15 and Fairmount Ave. Consider Urban Villages where intersecting with a north-south main street as described above and where parcel sizes allow. Additionally, ensure gradual density transitions and upzone the parcels between Wightman and Landis west of the 15 and parcels between Landis and Dwight between the 15 and Fairmount to Residential Medium 55-73. Federal Blvd: Federal/47th should be zoned CC 74-109. Between 47th and 54th/Euclid on Federal, parcels should be zoned Residential Medium 55-73, with appropriate stepdowns in zoning further from the street. Kensington: In this higher resource area, upzone. East of the 15, south of Adams, and west of Van Dyke, upzone to residential Medium 55-73. In the area bounded by Adams to the north, Van Dyke to the west, Monroe to the south, and Aldine to the east, upzone to Residential 30-44. Corridor and Teralta West: Due to the high density of the east-west arterials in the area and proximity to a few north-south main streets with similarly high density, gradual stepdowns in density should never go below Residential Medium 74-109. This could also apply to Teralta East. "	Sam Borinsky

"Splitting zoning hierarchically into Transit Village, Transit Corridors, Transit Neighborhoods, and Main Streets is a smart way to ensure that growth is guided appropriately to the areas that are best suited to absorb it. Additionally, ensuring gradual transitions helps make changes in density feel natural. For these reasons, though, a large portion of Mid-City should be zoned far denser. Fairmount is correctly zoned as a transit village, but the same zoning should also be applied along the 15 between University and El Cajon as well. With the high quality bus infrastructure along the 15 and the intersecting routes on El Cajon and University, AND the huge cap going in, this area should be where we concentrate development to maximize accessibility to infrastructure. To ensure compatibility with gradual transitions, the entire area enclosed by Fairmount to the east, University to the south, SR15 to the west, and El Cajon Blvd to the north, should retain the highest density transit village designation. To further ensure gradual stepdowns, the areas between El Cajon Blvd and University Ave west of 54th St (inclusive), which are never more than a couple blocks from a high quality transit corridor, especially when factoring in the plentiful high quality bike routes, should similarly very gradually transition away from the transit corridor zoning, and should remain transit corridor zoning in this small interior. Mid-City has 3 important east-west arterials, but lacks the same north-south. This plan should designate a few key corridors as north-south Main Street nodes. Streets such as 35th St with its bike infrastructure, SR15 with the huge freeway cap, Fairmount Ave, Euclid Ave, portions of Winona Ave, portions of 54th St, and College Ave should all be designated Main Streets if not Transit Corridors and Transit Villages. Nodes of transit villages should also be zoned where Main Streets (or denser) intersect, as the mobility infrastructure is higher where two pieces of infrastructure intersect."	Sam Borinsky

"The community plan update takes some great steps to ensure a more liveable Mid-City, but as a 30 year roadmap guiding development within the entire community planning area it's important to ensure that planned and likely projects that improve mobility are explicitly included. A future politician can point to the community plan and have an easier pathway to including say a bus lane. There are many planned projects that should be included. Rapid 625 for example. It is a planned, near-term, SANDAG Rapid, with designs for bus lanes already released. The plan should explicitly call out projects such as these and include the bus lanes in the maps of the next draft. Bus lanes should be explicitly called for along the entirety of El Cajon (thank you for doing so, but also PLEASE study center-running), the sections of University Ave that have the RoW space (due to traffic calming) with the Rapid 210 from the border with North Park to La Mesa, Fairmount Ave (host to the highest ridership route in the system) transit lanes on the expressway section and then transit lanes in either both directions or a one way couplet with 43rd/Fairmount as far south as can go, the length of 54th St (955 & 625), and College Ave (256). Cycling infrastructure is also vital for mobility. Adams Ave currently has a proposed class III bike lane-a sharrow. On such a busy, high-speed artertial, forcing cyclists to share traffic lanes with cars will certainly result in injury and death. There should instead be Class IV protections to ensure that cyclists remain safe and separated from cars. The plan should also close the small planned gap of Class IV bike infrastructure on University east of College Ave. tldr: explicitly plan for bus lanes along all of University Ave, Fairmount Ave, 54th St, and College Ave, and then add high quality separated bike infrastructure on Adams Ave, and close gaps in the high quality network."	Sam Borinsky

I think this current approach is a good starting point, but it may be worth considering how we could incrementally expand density outward toward the yellow zones in the future. Another important aspect is transportation. If we significantly increase density, we also need to make public transportation a convenient and reliable way to get around. Otherwise, adding more residents without providing adequate alternatives to driving could lead to more traffic and make walking and cycling less comfortable and safe. I'd also like to see the Residential Medium-2 areas allow for small-scale commercial activity, such as cafés, convenience stores, and pharmacies. I remember from my time in Japan being able to walk down a quiet but relatively dense residential street and find a small café tucked away among the homes, serving the surrounding neighborhood without needing a large parking lot. I think Mid-City could benefit from this kind of fine-grained, neighborhood-serving commercial activity. If commercial uses are restricted entirely to major arterial roads, residents may have to walk several blocks just to get basic services. Allowing small, low-impact businesses within residential areas could make these neighborhoods more walkable and livable while still keeping larger commercial activity concentrated along the major corridors.	skylar
Don't think you're helping the less fortunate, it is well proven that price fixing algorithms across the country with similar urban over developments outprixe exactly who you say you are serving.	Dave Loomis
Budget constraints are already told to us as reasons for not enforcing laws, you can collect money for deviance but instead allow bad actors to ruin our community. Enforce what you say, then we can talk about what you want to do. How can we possibly believe your plan when enforcement doesnt exist?!	Dave Loomis
Stop patting yourselves on the back after not listening to us, and start fighting for our right to stay classy!	Dave Loomis

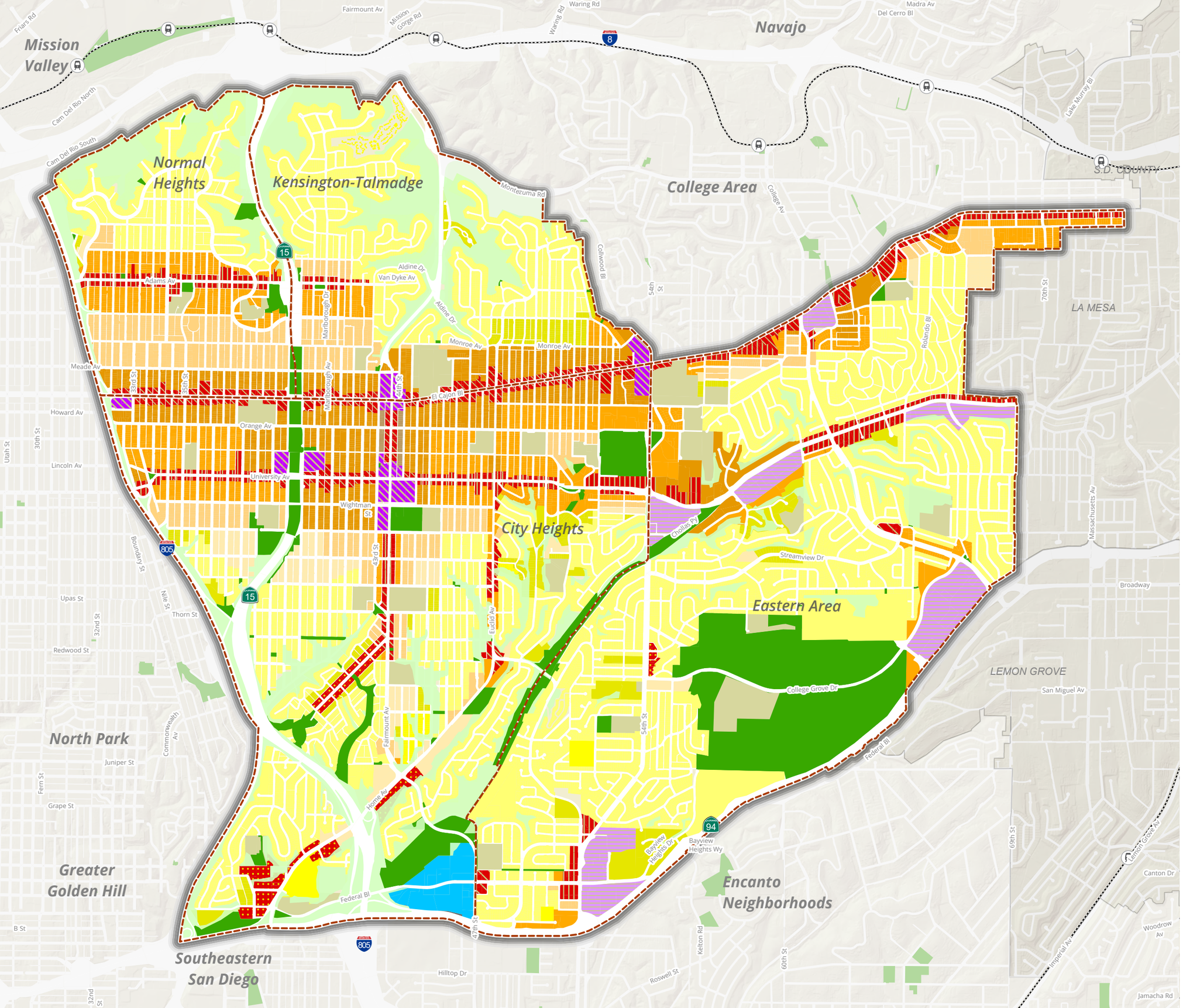
What a farce, if you'll take this comment two hours late on a process and initial feedback that was very apparent to be thinly veiled self validation, then it is time to just look at facts. This wasn't represented well by property owners, and is being forced onto us. My english teacher in college said if the initial draft looked anything like the final work you didn't try enough yet. How true of this, it is a good start, but vastly deficient. A plan or policy without law will be abused by bad actors, your assumptions are open sores which will have those of us living here dealing with your hubris long after you've left your position. The buildings you want to scrap the skies with will not be affordable, they will have new age price fixing algoirthms which will isolate and alienate. You need to have comprehensive budgetary planning with fire, police, traffic, education, and dear god land use enforcement which supports these plans. Don't you dare say they will figure it out with our tax paying money, when you are causing the delta, and you can't pass it along when everything is going larger. An atrocity across all functions! We have violations of land use, poor evacuation plans, and risks to school children which go unchecked and unfettered, show you can serve us before adding more people. Vehemently fight outdated " transit priorities" which involve a single bus line which isn't even used instead of force feeding us building plans on bad actors. We the people who live and walk here shouldn't stand for those who walk away to ruin another town on myopic " dreams."	Dave Loomis
Have you ridden these "priorities," if MTS is shutting down lines and they are sorely sypported, then you meed to seruously deescalate building upzoning. We are not well represented, cross-dept data is not included. We are not your scapegoat for other communities with more representatives.	Dave Loomis
We barely have parks, one of them is inside the school at Franklin Elementary, it isn't open to people often, and daying a path arounf geographically hard cantons isn't a green space it is a hazard. Take an acrual walk with a stroller, like we do around, and if you can't add green space, maybe dont tell us about eight story tall buildings within it! what a sham, do the leg work like an elder you respect in your community.	Dave Loomis
Be more respectful, this was pretty pathetic in the presentation and you don't care what peiple say. I have little kids and it is clear you don't think about how they move, are scared, and have been killed on the streets inour current neighborhoods. Seriously, you need to address this in earnest, including safe walking paths, desired parhs, and ignored improvements to sidewalks. how can more peiple walk around when there is no place to walk?	Dave Loomis


Mission Valley
Cam Del Rio North
Cam Del Rio South
Fairmount Av
Green Line
Navajo
Montezuma Rd
College Area
El Cajon Bl
Normal Heights
Kensington-Talmadge
Adams Av
35th St
33rd St
Meade Av
Monroe Av
Collwood Bl
54th St
Ridgeview Dr
70th St
La Mesa
Howard Av
30th St
32nd St
Lincoln Av
Orange Av
University Av
Marlborough Av
43rd St
44th St
Euclid Av
Rolando Bl
Massachusetts Av
North Park
Upas St
Nile St
Thorn St
Boundary St
Redwood St
City Heights
Cholias Pl
Streamview Dr
College Av
Eastern Area
Lemon Grove
San Miguel Av
College Grove Dr
Juniper St
Grape St
Fern St
Home Av
Federal Bl
Greater Golden Hill
Encanto Neighborhoods
Southeastern San Diego
Hilltop Dr
Roswell St
Kelton Rd
69th St

Attachment 6

Figure 2-1

DRAFT



- Trolley Stop
- Community Plan Boundary

Plan Land Use

- Residential Low-2 (5-9 du/ac)
- Residential Low-3 (10-15 du/ac)
- Residential Low-4 (15-29 du/ac)
- Residential Medium-1 (30-44 du/ac)
- Residential Medium-2 (45-54 du/ac)
- Residential Medium-3 (55-73 du/ac)
- Residential Medium-4 (74-109 du/ac)
- Residential High-2 (146-218 du/ac)
- Community Commercial (0-44 du/ac)
- Community Commercial (45-73 du/ac)
- Community Commercial (74-109 du/ac)
- Community Commercial (110-218 du/ac)
- Community Village (0-145 du/ac)
- Urban Village (0-218 du/ac)
- Institutional
- Park
- Open Space
- Utility
- Industrial

0 0.25 0.5 Miles

N W E S

Source: City of San Diego, SanGIS, SANDAG

Attachment 7

The City of SAN DIEGO

Community Plan Boundary

TCAC/HCD Opportunity Areas

- High Resource
- Moderate Resource
- Low Resource

0 0.25 0.5 Miles

N W E S

City of San Diego, SANGIS, SANDAG

Mission Valley
Navajo
College Area
Normal Heights
Kensington-Talmadge
Eastern Area
La Mesa
North Park
City Heights
Greater Golden Hill
Southeastern San Diego
Encanto Neighborhoods
Lemon Grove

Green Line
Cam Del Rio North
Cam Del Rio South
Fairmount Av
Montezuma Rd
Lake Murray Bl
Aztec Dr
Jackson Dr
El Cajon Bl
Collwood Bl
54th St
Monroe Av
Adams Av
35th St
33rd St
Meade Av
El Cajon Bl
Marlborough Av
43rd St
44th St
Euclid Av
Rolando Bl
70th St
Glen St
Spring St
Utah St
Howard Av
30th St
32nd St
Lincoln Av
Orange Av
University Av
Massachusetts Av
Lemon Grove Wy
Sweetwater Rd
Broadway
Kempf St
Troy St
Palm St
San Miguel Av
Lemon Grove Av
Skyline Dr
Blossom Ln
Canton Dr
Woodrow Av
Jamacha Rd
Cardiff St
Helix St
Nile St
Thorn St
Boundary St
Upas St
Redwood St
Juniper St
Grape St
Fern St
B St
Hilltop Dr
Roswell St
Chollas Py
College Av
Streamview Dr
College Grove Dr
Federal Bl
47th St
Kelton Rd
60th St
69th St
Home Av

Attachment 8

Mid-City CPU

DRAFT

- Trolley Stop
- Community Plan Boundary
- SB79 TOD Areas

0 0.25 0.5 Miles

N W E S

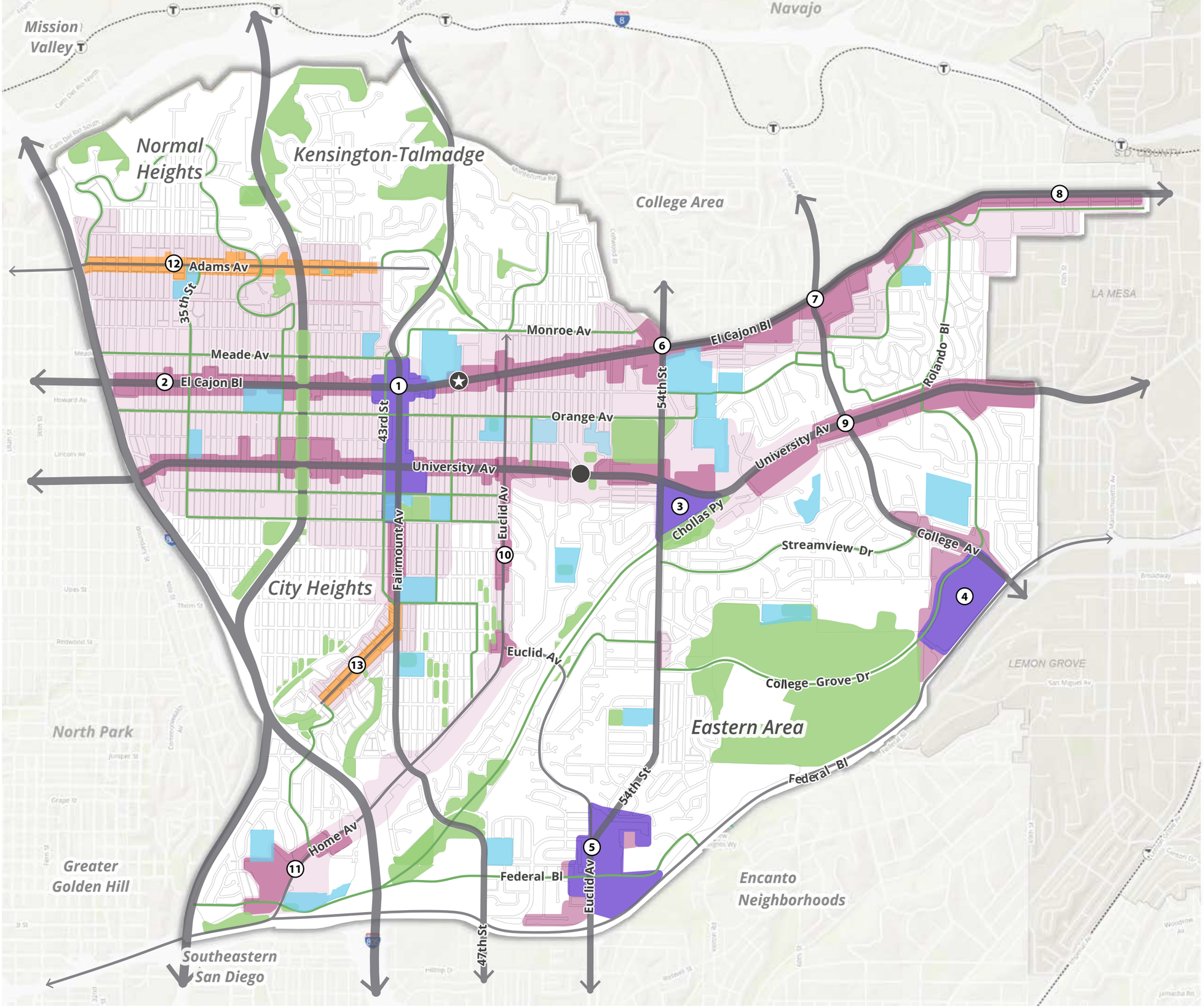
Source: City of San Diego, SanGIS, SANDAG

Date: 11/9/2026 9:53 AM

Attachment 9

Figure 5-1

DRAFT



- Roadway Network
- Existing and Proposed Parks and Open Spaces
- Existing Institutions
- **Green Corridors:** Bike and pedestrian connections

Urban Design Framework

- **Transit Villages:** A mix of uses concentrating commercial, office and the highest density around transit
- **Transit Corridors:** A mix of uses and density oriented along main transit corridors
- **Main Street:** Smaller scale mixed-use and community activity centers
- **Transit Neighborhoods:** Lower-scale buildings and missing-middle housing types that provide a transition from transit corridors and transit villages.
- Little Saigon Cultural District
- Somali Town (Potential Cultural district)

Study Areas

1. Mid-City Center
2. Mid-City West
3. Chollas Triangle
4. Marketplace at the Grove
5. Federal Boulevard and Euclid Avenue
6. El Cajon Boulevard and 54th Street
7. El Cajon Bouleavard and College Avenue
8. El Cajon Boulevard and Montezuma Road to 73rd St
9. University Avenue
10. Euclid Avenue
11. Fairmount Park and Home Avenue
12. Adams Avenue
13. Poplar Street

0 0.25 0.5 Miles

Source: City of San Diego, SanGIS, SANDAG

Placeholder for Attachment 10: Urban Design Concept Analysis

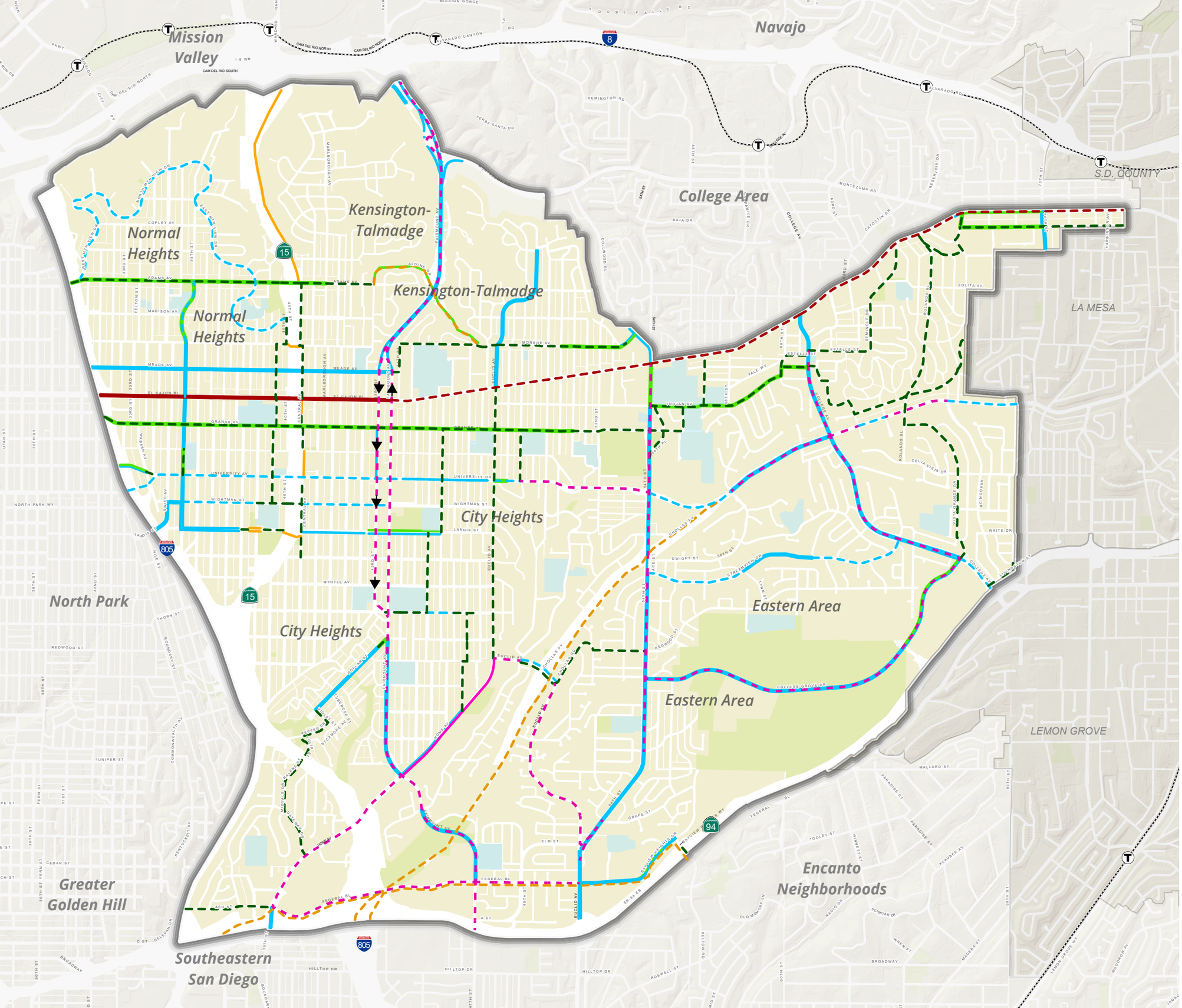
Click this link to view the Urban Design Concept Analysis

- or visit –

www.sandiego.gov/sites/default/files/2026-08/draft-mid-city-urban-design-concepts_web.08.05.pdf

Figure 6-2

DRAFT



- Trolley Stop
- Schools
- City Parks and Open Space

Planned Bicycle Network

- Class I -Multi-Use
- Class II -Bike Lane
- Class III -Enhanced Bike Route
- Class IV Cycle Track
- Bus-Bike Lane

Existing Bicycle Network

- Class I
- Class II
- Class III
- Class IV Cycle Track
- Bus-Bike Lane

Recommended bicycle facility classifications may refined at the project level based on further study. Class 1 Multi-Use Path alignment and facility type will be evaluated at the project level.

0 0.25 0.5 Miles

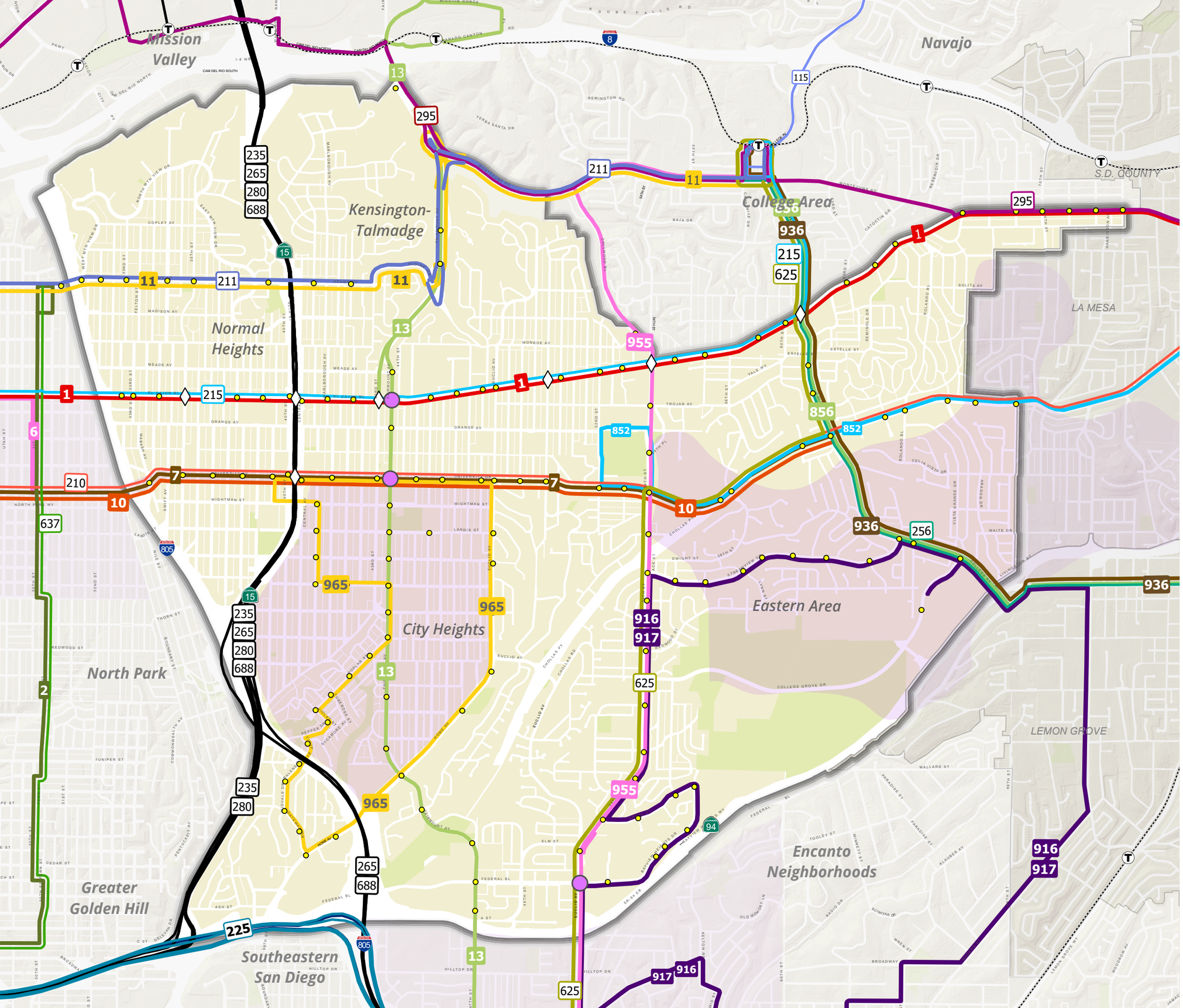
N W E S

Source: City of San Diego, SanGIS, SANDAG

Attachment 12

Figure 6-3

DRAFT



- Local Bus Stop
- Rapid Station
- Trolley Stop
- Potential Purple Line Stop
- City Parks and Open Space
- Microtransit Area

Planned Transit Facilities

Rapid Bus Route

210 256 265 280 295 625 637 647 688

SC = Streetcar

Existing Transit Facilities

Rapid Bus Route

215 225 235

Local Bus Route

1 2 6 7 10 11 13 14 18 115 852 856 916 917 936 955 965

0 0.25 0.5 Miles

Source: City of San Diego, SanGIS, SANDAG

Attachment 13

Mid-City CPU

DRAFT

- Trolley Stop
- Existing Recreation Center
- Existing Aquatic Complex
- Proposed Aquatic Complex
- Proposed Ranger Station
- Proposed Recreation Center
- Existing Trail
- Potential Trail
- Potential Trail Connector
- Open Space
- Existing Park
- Joint Use Park
- Proposed Park
- Proposed Joint Use

0 0.25 0.5 Miles

N W E S

Source: City of San Diego, SanGIS, SANDAG

Date: 9/11/2026 9:22 AM

THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: October 9, 2026

TO: Coby Tomlins, Program Manager, City Planning

FROM: Anthony Tosca, Assistant Chief/Fire Marshal, Fire-Rescue Department

SUBJECT: Mid-City Communities Plan Update

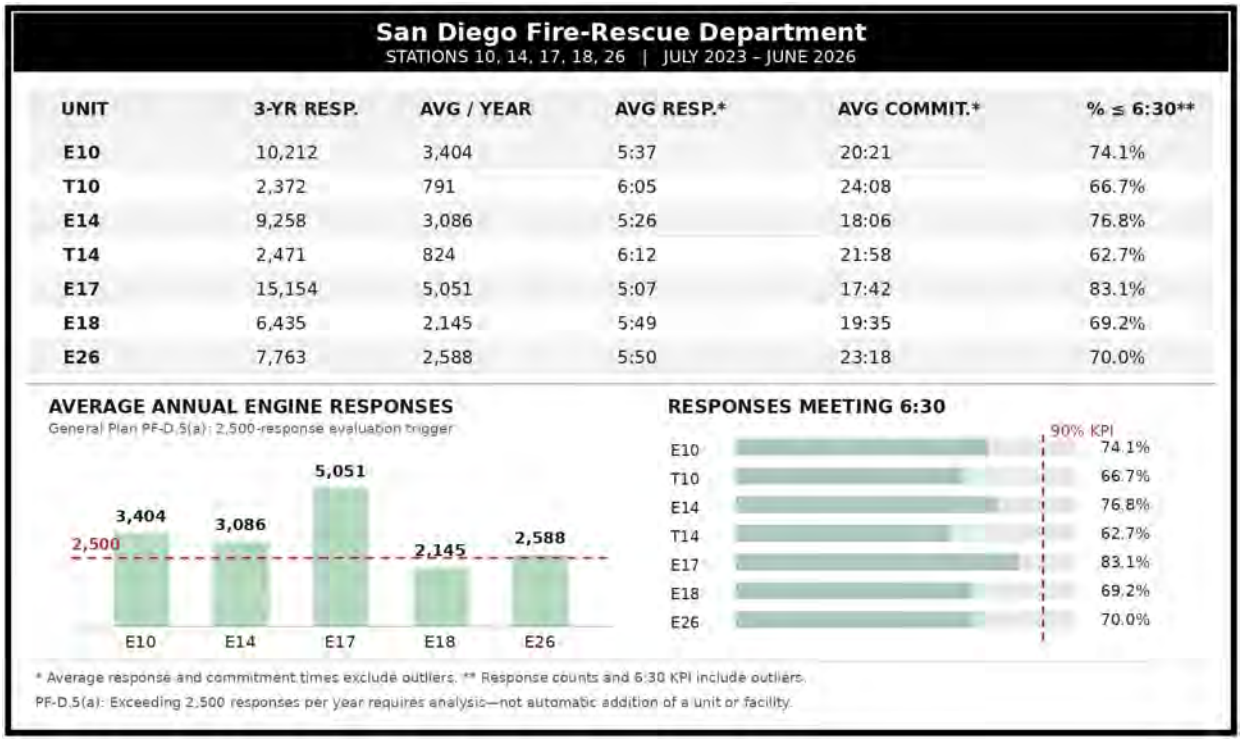
Purpose
The purpose of this memo is to identify community recommendations to maintain adequate fire services in the Mid-City Communities Plan Area based on estimated future population and existing emergency response demand. These recommendations are intended as long-term guidance over the next 30 years and represent one of several possible approaches to meeting the community's fire service needs. Implementation will depend on future development activity, funding availability, and further technical analysis.

Existing Services
Mid-City planning area includes City Heights, Eastern Area, Kensington-Talmadge, and Normal Heights. SDFD fire stations 10, 14, 17, 18, and 26 provide substantial emergency response coverage, with additional service from surrounding stations. Each response unit operates out of an existing fire station and provides first-due coverage across the Mid-City plan area boundaries.

Emergency Unit Responses from July 2023 to June 2026:

- Fire Station 10 recorded **12,652** unit responses (**4,217/year**)
- Fire Station 14 recorded **12,269** unit responses (**4,090/year**)
- Fire Station 17 recorded **15,154** unit responses (**5,051/year**)
- Fire Station 18 recorded **6,435** unit responses (**2,145/year**)
- Fire Station 26 recorded **7,763** unit responses (**2,588/year**)

The five stations recorded **54,273 unit responses**, averaging approximately **18,091 per year**. These are unit responses, not unique emergency incidents, and may include incidents outside the planning area.



The five engines alone recorded 48,822 unit responses during the three-year period (approximately 16,274 per year). ***Four of the five engines exceeded 2,500 annual responses****, the General Plan threshold requiring evaluation of potential additional services or facilities. Average engine response and commitment times, with outliers excluded, were 5:30 and 19:29, respectively. See the response exhibit above.*

Potential Growth – Mid-City Community Plan

The draft Mid-City Communities Plan projects population growth from approximately 138,000 to 227,000, an increase of 89,000 residents (64.5%). It also anticipates approximately 42,000 additional homes and 1.9 million square feet of additional nonresidential development.

If engine unit responses increased proportionally with population, the current 16,274 annual responses could rise to approximately 26,800 per year. This is an illustrative planning scenario, not a forecast; station response districts extend beyond the community plan boundaries.

Existing Regulatory Framework

- **City of San Diego General Plan** – Public Facilities, Services and Safety Element requires adequate fire protection and emergency response for new development. Specifically, Policy PF-D.2 addresses future station and deployment needs. Policy PF-D.5(a) requires analysis to determine the need for additional services or facilities when a single unit exceeds 2,500 annual responses.
- **San Diego Municipal Code** – Requires compliance with Fire-Rescue Standards of Response Cover for new land use planning.
- **California Fire/WUI Code** – Establish requirements for fire flow, hydrant spacing, access/egress, fire protection plans for Wildland Urban Interface Fire Areas.
- **Public Resource Code 4290.5 (a) –** Established subdivision review program to evaluate emergency evacuation routes for existing subdivisions.
- **NFPA 1710 (National Fire Protection Association)** – Provides national benchmarks for career fire department deployment and performance.

- **Climate Resilient SD Plan** – Addresses wildfire, extreme heat, and disaster preparedness.

Discussion
The following section provides a high-level assessment of how projected growth could affect fire protection services in Mid-City. It is intended to guide future planning and infrastructure decisions, not impose specific resource requirements. Additional studies will be necessary as development comes forward.

- **Call Volume and General Plan Evaluation Trigger –** Engines 10, 14, 17, and 26 average 3,404, 3,086, 5,051, and 2,588 responses per year, respectively, exceeding the 2,500-response threshold in General Plan Policy PF-D.5(a). Engine 18 averages 2,145. The policy calls for analysis of service or facility needs; exceeding the threshold does not itself prescribe an additional unit or station. Population growth is expected to increase workload.
- **Response Time –** SDFD's response time goal is to arrive on scene of an emergency within 6:30 of the initial dispatch 90% of the time. Engine companies achieved 69.2%–83.1% compliance; truck companies achieved 62.7%–66.7%. None of the seven companies met the KPI over the three-year period.
- **Commitment Times –** Average engine commitment times ranged from 17:42 to 23:18. Concurrent responses and extended incidents reduce available coverage and can increase reliance on neighboring companies.
- **Wildfire and Emergency Access –** Canyon edges and hillsides in Very High Fire Hazard Severity Zones create additional risks. Fire apparatus access, secondary evacuation routes where needed, fire flow, defensible space, and brush-response capacity require continued attention.
- **Firefighter Staffing –** A population-based planning comparison of one firefighter per 1,000 residents, measured against total firefighter staffing corresponds to 89 additional firefighters to accommodate the potential population increase of 89,000. This is not an established Mid-City staffing deficit and does not establish where those personnel would be deployed.

Additional Considerations

- Higher-density residential and mixed-use development can increase the potential for multi-company incidents, and demand for truck, aerial, rescue, and emergency medical resources.
- Engine 17 experienced the greatest workload of the five engines, while also reporting the highest percentage of responses within 6:30. Company performance should be evaluated together with geography and simultaneous-call demand.

Recommendations
The following recommendations are provided for consideration and are subject to development coming forward, future community needs, and additional study. The Community Plan is a long-term policy document; the options below represent potential approaches rather than commitments to specific facilities, apparatus, or staffing.

1. **Future Fire Station Facilities and Apparatus –** Undertake additional analysis of unit availability, geographic response coverage, simultaneous incidents, and response-time performance consistent with General Plan Policy PF-D.5(a). Continue evaluating the potential Fairmount Avenue station near 47th Street identified in the draft plan.

Consider expansion of existing facilities, additional apparatus, and adjusted deployment as alternatives, with timing determined by future study.

2. **Potential Staffing Needs -** Use one firefighter per 1,000 residents of total staffing as a long-range planning comparison. The projected population increase equates to approximately 89 additional firefighters at that ratio, but actual hiring and deployment decisions should be based on citywide staffing, response coverage, and demonstrated demand.

3. **Operational Strategies -** Consider peak-hour or other flexible deployment, community risk reduction and fire prevention programs, coordination with surrounding stations, and improvements to access, water supply, and evacuation planning. Monitor both the General Plan 2,500-response evaluation trigger and the SDFD 6:30 / 90% KPI as growth occurs.

Summary
Potential growth across the City of San Diego, including additional development within the Mid-City Communities Plan area, is expected to place increased demands on fire protection and emergency medical services.

Existing company data show that four of the five engines exceeded the General Plan's 2,500-response evaluation threshold and that none of the seven reviewed engine and truck companies achieved SDFD's objective of responding within 6:30 on 90% of emergency responses. These conditions support additional assessment of service and facility needs before anticipated growth further increases demand. The projected population increase also corresponds to a potential 89-firefighter planning increment at one firefighter per 1,000 residents of total staffing; this is not a demonstrated Mid-City staffing deficit or an assignment recommendation. The Department should continue to evaluate station location, resource deployment, and other service options as development proceeds.

This assessment and the recommendations above are intended as long-term guidance. They should be considered alongside development timing, citywide resource availability, response-time performance, and future funding.

AAT/dkh

cc: Robert Logan, Chief, Fire-Rescue Department
Ted Moran, Deputy Chief -Business Operations, Fire-Rescue Department
Dan Eddy, Deputy Chief - Emergency Operations, Fire-Rescue Department
Dan Hypes, Assistant Fire Marshal, Fire-Rescue Department

Placeholder for Attachment 15: Proposed Community Enhancement Overlay Zone Regulation

Click this link to view the Proposed Community Enhancement Overlay Zone Regulation

- or visit –

www.sandiego.gov/sites/default/files/2026-08/draft-mid-city-ceoz-ordinance_8_07_26.pdf