

Date: June 15, 2023

To: City of San Diego Planning Commission  
Chair Hofman and Commissioners

Subject: Peninsula Community Planning Board Opposes SB-10

The Peninsula Community Planning Board concurs with the Planning Commission that SB-10 is “fatally flawed” and no housing regulation should be irrevocable. We applaud the Planning Commission's decision to continue Agenda Item 1, Housing Action Package 2.0, due to concerns raised by the Community and Commission and we urge the removal of SB-10 from the Housing Action Package.

SB-10 would allow 10-unit buildings up to three stories tall on single-family parcels exceeding the density of most of San Diego’s apartment zoning. Tiny lots of just 1000 sf are eligible for development under SB-10.

SB-10 violates San Diego’s Climate Action Plan, including its Mobility Mode Shift goals, by encouraging dense development up to a mile from transit. Numerous federal, state, local, and academic studies have shown that few people will use transit if they have to walk more than one-half mile to a bus or trolley.

As noted by the Commission, infrastructure in single family neighborhoods lacks the infrastructure to accommodate multi-dwelling units as proposed under SB-10. Water and Sewer facilities are inadequate to accommodate multi-dwelling units in single family zoned neighborhoods. Fire protection in single family zoning consists of 8-inch water mains which are undersized to provide the required water pressure to combat fires in high density zoning as proposed under SB-10. Increased densities will result in increased impervious surfaces and reduced landscaping which will increase stormwater run-off and overburden the existing stormwater and drainage system.

Current water and sewer capacity charges and development fees do not account for the additional infrastructure needed to accommodate high density growth in single family zones. Over the next five years, per the City’s 2024-2028 Five -Year Capital infrastructure Planning Outlook, CIP infrastructure needs are projected to reach \$9.75 billion. The city estimates a budget shortfall of \$5.17 billion. The adoption of SB-10 will dramatically increase this CIP budget shortfall.

For these reasons and the many reasons stated in the Commission Hearing of June 1, we strongly urge the Planning Commission to oppose the implementation of SB-10. Our City deserves a sustainable, walkable, community-driven approach to housing and not SB-10.

Sincerely,

Frederick Kosmo,  
PCPB-Chair

cc; Dr. Jennifer Campbell, Councilmember District 2