

# Land Development Code Update

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# Land Development Code Update (2025)

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- Annually the City updates the Land Development Code
- The preliminary lists of citywide and Downtown amendments for the 2025 Land Development Code (LDC) Update are now available for public review.
- The 2025 LDC Update includes a total of 142 proposed amendments: 106 Citywide and 36 Downtown-specific amendments.

## **2025 Citywide List**

[2025 LDC Update Citywide List - Discussion Draft \(8/5/25\)](#)

## **2025 Downtown List**

[2025 LDC Update Downtown List - Discussion Draft \(8/5/25\)](#)

- These are pdfs of topline summaries and the draft code language is not provided. Exact text of proposed code changes is required for a complete review of these proposals.

# Land Development Code Update (2026)

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- Planning for the Next LDC Update
- The public is able to submit code amendment requests for the 2026 LDC. The submission portal is open **until October 31, 2025**.
- Requests can be submitted on this webpage:  
<https://www.sandiego.gov/planning/programs/land-development-code/lcdc-update-request>

# Proposed Submission 1

- **Title:** Limit Number of Dwelling Units per Parcel That May Be Short-term Rentals (STRs)
  - **Type of amendment:** Regulatory Reform
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- **Issue:** Entire multi-unit apartment and beach bungalow complexes are being converted to STRs. Licenses are being concentrated within the hands of a few by using proxy licensees. This is removing a significant amount of Naturally Occurring Affordable Housing (NOAH) in the coastal areas and is forcing long-term renters out of their homes either by their apartments being converted to STRs or by increased rents due to the reduction in available affordable housing stock.
  - **Solution:** Add a requirement that on a parcel that has 5 or fewer dwelling units, only one dwelling unit may have a Tier 3 or Tier 4 STR license. On a parcel with 6 or more dwelling units, only 2 or 20% of the dwelling units may have Tier 3 or Tier 4 STR licenses, whichever is greater.
  - **Code Section Affected:** §510.0104(d), §510.0104(e)

# Proposed Submission 1

- **Recommended Code Amendment:**

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§ 510.0104(d) (no change)

(1) to (5) no change

(6) A parcel that has 5 or fewer dwelling units, only one dwelling unit may have an STR license. On a parcel with 6 or more dwelling units, only 2 dwelling units or 20% of the dwelling units may have STR licenses, whichever is greater.

§ 510.0104(e) (no change)

(1) to (4) no change

(5) A parcel that has 5 or fewer dwelling units, only one dwelling unit may have an STR license. On a parcel with 6 or more dwelling units, only 2 dwelling units or 20% of the dwelling units may have STR licenses, whichever is greater.

# Proposed Submission 2

- **Title:** Distribute Short-Term Rentals by Community Planning Area
  - **Type of amendment:** Regulatory Reform
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- **Issue:** Short-term rentals are being over-concentrated in a few communities which is adversely impacting those communities. Over 8% of the housing stock in zip code 92107 (Ocean Beach/Southern Point Loma) has been converted to STRs and the percentage increases each year. This over-concentration is causing the loss of naturally occurring affordable housing in the last affordable coastal housing area of the City and is forcing long term renters out. The objective of this proposed change is to more evenly distribute the impact of short term rentals across the City, so as to mitigate the negative impacts of STRs when their concentration gets too high.
  - **Solution:** Limit the number of STRs within each Community Planning Area to no more than 1% of the housing units located in each Community Planning Area.
  - **Code Section Affected:** §510.0104(d)(4), §510.0104(d)(5)

# Proposed Submission 2

- **Recommended Code Amendment:**

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§510.0104(d)

(4) The total number of Tier Three Licenses issued shall not exceed 1 percent of the total housing units in each Community Planning Area ~~the City of San Diego~~, excluding the total housing units within the Mission Beach Community Planning Area, based on the most recent Demographic and Socioeconomic Housing estimates issued by the San Diego Association of Governments (SANDAG), rounded up to the next whole number. The total number of available Tier Three Licenses shall be updated once every two years based on the formula in this section 510.0104(d)(4). ~~The total number of Tier Three Licenses shall not be reduced below the total number of Tier Three Licenses available in the prior two year period.~~

~~(5) Tier Three Licenses issued on a lottery basis shall be issued to each Community Planning Area in proportion to the Community Planning Area's percentage of the overall Tier Three License applicant pool~~

# Proposed Submission 3

- **Title:** STR Host Must be on Parcel's Deed for Tier 3 or Tier 4 License
  - **Type of amendment:** Regulatory Reform
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- **Issue:** Multi-dwelling unit owners are gaming the system by using proxies (“hosts”) to apply for Tier 3 and Tier 4 licenses. Entire apartment and beach bungalow complexes (100% of all dwelling units in some >8-unit complexes) are being rented as short term rentals (<30 days), which is turning them effectively into motels/hotels and is removing a significant amount of Naturally Occurring Affordable Housing in some neighborhoods. Allowing this gaming of the system means that the Code is not working as intended when it was implemented.
  - **Solution:** : Add a requirement that hosts for a Tier 3 or Tier 4 permit must be a record owner, per definition 113.0103.
  - **Code Section Affected:** §113.0103, §510.0104(d), §510.0104(e), §510.0102

# Proposed Submission 3

- **Recommended Code Amendment:**

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Add:

§510.0102

*Record owner* has the same meaning as in Municipal Code section 113.0103

Amend:

§510.0104(d) (no change)

(1) to (5) no change

(6) *A host must be a record owner for the dwelling unit.*

§510.0104(e) (no change)

(1) to (4) no change

(5) *A host must be a record owner for the dwelling unit.*

# Proposed Submission 4

- **Title:** Change major transit stops used to define Sustainable Development Area (SDA) from planned in the Regional Transportation Plan (RTP) to those that already exist or are funded to be completed in the current planning cycle (RTIP)
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- **Type of amendment:** Regulatory Reform
  - **Issue:** The RTP forecasts out to 2050, which is decades in the future. Because the SDA is based on the RTP, this means that transit-oriented projects, especially bonus Accessory Dwelling Unit (ADU) and Complete Community Housing Solutions (CCHS), are being built where high quality transit does not exist and will not exist for decades, if ever. The deed-restrictions on Bonus ADUs will likely expire prior to the high-quality transit are even online in 2050. This is contrary to the principles of building near transit so as to encourage transit usage with the intent of reducing green-house gas emissions.
  - **Solution:** : Amend the Code to base the Sustainable Development Area (SDA) on the major transit stops in the Regional Transportation Improvement Program (RTIP) instead of the Regional Transportation Plan (RTP).
  - **Code Section Affected:** §113.0103

# Proposed Submission 4

- **Recommended Code Amendment:**

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Amend:

**§113.0103 Definitions**

*Sustainable Development Area* means the area within a defined walking distance along a pedestrian path of travel from a *major transit stop* that is existing or funded to be completed in the Regional Transportation Improvement Program ~~or applicable regional transportation plan~~, as follows:

[No change to the rest of the definition]

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# Proposed Submission 5

- **Title:** Change SDA Walking Distance to ½-Mile to Transit Stop
  - **Type of amendment:** Regulatory Reform
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- **Issue:** Studies show that the walkshed for trainstops is limited to ½-mile walking distance. There are no supporting evidence that residents living 1-mile away from a transit stop would use transit over other modes of transportation. SANDAG's own surveys clearly show that transit adoption drops off sharply beyond ½-mile. As a result, the SDA reinforces San Diego's automobile dependence, contrary to the goals of the Climate Action Plan.
  - **Solution:** : Amend the San Diego Municipal Code to base the Sustainable Development Area (SDA) on one-half mile walking distance instead of the current one-mile walking distance. Because the SDA is only applied to local programs, it is within the jurisdiction of the city to make this change.
  - **Code Section Affected:** §113.0103

# Proposed Submission 5

- **Recommended Code Amendment:**

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Amend:

## **§113.0103 Definitions**

*Sustainable Development Area* means the area within a defined walking distance of 0.5 mile along a pedestrian path of travel from a *major transit stop* that is existing or planned, if the planned *major transit stop* is included in a transportation improvement program or applicable regional transportation plan, ~~as follows:~~

- ~~(a) Within Mobility Zones 1 and 3, as defined in Section 143.1103, the defined walking distance is 1.0 mile.~~
- ~~(b) Within Mobility Zone 4, as defined in Section 143.1103, the defined walking distance is .75 mile.~~
- ~~(c) For *parcels* located in Mobility Zone 4, in an area identified as a High or Highest Resource California Tax Credit Allocation Committee (CTCAC) Opportunity Area, the defined walking distance is 1.0 mile.~~

In addition, an adopted specific plan prepared in accordance with section 122.0107(a), shall be within the *Sustainable Development Area* if the *Sustainable Development Area* is within a portion of the adopted specific plan.

# Proposed Submission 5

- **Title:** Revise the interior side *yard* and rear *yard* setback for ADU structure to be four (4) feet as allowed by state law.
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- **Type of amendment:** Regulatory Reform
  - **Issue:** Currently the code for interior side yard and rear yard setback is complex and difficult to understand. Additionally, it allows for ADU structures to be built on the property line which encroaches on the abutting properties because it requires access to the abutting property for construction and maintenance of the ADU structures in residential neighborhoods. It is also a fire hazard should any of the structures catch fire and these ADU structures that are built on the property line do not require fire sprinklers for fire abatement.
  - **Solution:** : Amend the San Diego Municipal Code to set a uniform four (4) feet setback for interior side yard and rear yard. Simpler code is better.
  - **Code Section Affected:** §141.0302(9)(C) through (D)

# Proposed Submission 5

- **Recommended Code Amendment:**

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Amend:

- (C) Interior side *yard* and rear *yard* setbacks for *ADU structures with a structure height of 16 feet or less shall be provided as follows:*
  - ~~(i) For *ADU structures* located on a *premises* outside of a High or Very High Fire Hazard Severity Zone, there is no minimum interior side *yard* and rear *yard setbacks*, except that the Fire Code Official may require a greater *setback* to ensure compliance with the California Fire Code, California Code of Regulations (CCR), Title 14, Section 1276.01, and the International Fire Code (IFC), including section 504.1.~~
  - ~~(ii) For *ADU structures* located on a *premises* within a High or Very High Fire Hazard Severity Zone, the minimum interior side *yard* and rear *yard setbacks* shall be 4 feet to provide defensible space between all *structures* on the *premises* and contiguous areas of native or naturalized vegetation, except that the Fire Code Official may require a greater setback to ensure compliance with the California Fire Code, California Code of Regulations (CCR), Title 14, Section 1276.01, and the International Fire Code (IFC), including section 504.1.~~

# Proposed Submission 5

- **Recommended Code Amendment:**

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Amend:

~~(D) Interior side yard and rear yard setbacks for ADU structures with a structure height that exceeds 16 feet shall be provided as follows:~~

~~(i) For ADU structures located on a premises outside of a High or Very High Fire Hazard Severity Zone, there is no minimum interior side yard and rear yard setbacks, except that the Fire Code Official may require a greater setback to ensure compliance with the California Fire Code. However, if the side or rear property line abuts another premises that is residentially zoned or developed with exclusively residential uses, the minimum interior side yard and rear yard setbacks shall be 4 feet or the minimum setback of the applicable base zone, whichever is less, except that the Fire Code Official may require a greater setback to ensure compliance with the California Fire Code, California Code of Regulations (CCR), Title 14, Section 1276.01, and the International Fire Code (IFC), including section 504.1.~~

~~(ii) For ADU structures located on a premises within a High or Very High Fire Hazard Severity Zone, the minimum interior side yard and rear yard setbacks shall be 4 feet to provide defensible space between all structures on the premises and any contiguous areas of native or naturalized vegetation or as otherwise required, except that the Fire Code Official may require a greater setback to ensure compliance with the California Fire Code, California Code of Regulations (CCR), Title 14, Section 1276.01, and the International Fire Code (IFC), including section 504.1.~~

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