

City of San Diego
San Diego City Council and Mayor Todd Gloria
202 C Street
San Diego, CA 92101

1/30/2025

Dear Mayor Gloria,

At the January 28, 2025, City Council meeting, the Council voted unanimously to ask City Planning to REMOVE the Bonus ADU Program so that the program is consistent with state-mandated ADU regulations. ***This action is far overdue, and I urgently urge you to request City Planning to draft such an ordinance for further consideration.***

The planned Bonus ADU development at 3378 North Mountain View in Normal Heights is perhaps a poster child for why this ill-conceived Bonus ADU Program should never have been implemented. It is far from transit — one whole mile from the intersection of two local buses (30th and Adams). I'm a retired transportation planner with specialized training and experience in transit planning and I can tell you that this is not a feasible distance for most people to walk to access transit, and especially not to a local bus line instead of to a major transit hub such as a rail station. I enthusiastically advocated for "transit-oriented development" and "smart growth" and I know that what San Diego has done isn't it.

Mr. Mayor, you can guide us forward to a land use/transportation policy that builds much-needed affordable housing that is realistically accessible to existing transit, preserves our single-family neighborhoods, and incorporates infrastructure support. We really can have true transit-oriented development that supports our transportation vision and creates vibrant places that people will naturally want to gravitate towards for their living/shopping/working/entertaining. Such a vision does not pit developers against neighbors or inhibit the construction of affordable housing. We can have it all. But we need your bold leadership now, starting with the removal of the Bonus ADU Program so that the ADU program is consistent with the state-mandated ADU regulations for single-family zoned parcels.

On a related note, please support a ban against building Bonus Accessory Dwelling Units (ADUs) in Very High Fire Hazard Severity Zones (VHFHSZs).

The above-referenced development is also on the canyon rim in a VHFHSZ and actually well within the footprint of the 1985 Normal Heights Fire. The plan is to construct 9 ADUs behind an existing older home. Instead of one household and home to evacuate and try to preserve, on that one lot there will be ten households and ten homes to evacuate and try to preserve. There will be no additional first responder support tied to the approval of the permit, nor will there be a DIF for infrastructure support. I surmise that the Fire Department and Police Department couldn't be happy with that arrangement. I know my neighbors and I certainly are not.

You might think the Chapter 7A building codes will save us. These do ensure that new construction in wildfire-prone areas will be constructed to meet minimum standards of materials and methods to protect against contagion from embers, vegetation and other structures. They are not meant to make the structures

fireproof, nor to allow occupants to shelter in place. They are meant to give occupants more time to evacuate.

There is no question that building new construction to these standards can make an enormous difference in the home's survival rate. However, in the 2017 Thomas Fire, more than 80 percent of the structures were reported to have fire-resistant construction. <https://www.npr.org/2018/12/09/673890767/fire-resistant-is-not-fire-proof-california-homeowners-discover> Any structure will burn if it has the necessary components of spark, oxygen and fuel. A single polyurethane sofa is enough to cause the destruction of an entire home.

Some of the other concerns vary by area, so the City's one-policy-fits-all approach is inappropriate. The City's brush management program is still spotty and inconsistent. The audit of brush management in city-owned properties uncovered a number of deficiencies. Water pressure is already low in some neighborhoods (such as ours). Here within the footprint of the 1985 Normal Heights Fire, the home water pressures here typically run about 42-43 psi, but sometimes run as low as 25 psi, and not long ago the city measured pressure at the nearest hydrant at 46-48 psi. My next-door neighbor who survived the 1985 Fire says the water pressure is as low now as it was then, when firefighters cited it as a factor in their difficulties in stopping the spread of the fire. There are neighboring (community) vegetative and structural fuels that cannot be fully mitigated. Evacuation efficiency is uncertain in some areas such as Kensington and University City.

There has been no modeling of the future impacts that these Bonus ADU developments are likely to have. There has been no CEQA review. What might be the cumulative impacts of additional density on water pressure, fire-rescue department resources, and evacuation efficiency? Once identified, can housing policy be revised or can additional resources be identified to meet the demands?

The recent fires in Los Angeles have caused great concern about the future of homeowners insurance in California. As you must already be aware, individual homeowners and renters increasingly face fewer options, as major insurers withdraw from our market, deny coverage, or impose unmanageable rate increases.

Worthy of consideration is that housing density is one of the factors in determining a property's insurability. It's not hard to believe that additional density in canyon areas won't cause insurers additional reasons to stay away, and this could affect everybody. The California Insurance Commissioner is still working to allow more rate-setting flexibility to insurers to keep them here and prevent the FAIR plan from going broke — but it likely means ever-higher rates.

*We absolutely need to build affordable housing — but not at any cost, and not without even knowing what potential costs there may be. **There is a need for now to at least call a moratorium on building large, dense Bonus ADU projects in our VHFHSZs until we can further delineate and address the problems and concerns, and find a balance with the need for more housing.*** The Fire Marshal should sit front, and center of this discussion and his voice should not be drowned out. There needs to be a more robust way to involve the communities who are being impacted by proposed policy changes. It is time for City leadership to step up. As our mayor, this responsibility rightfully begins with you.

Sandra Johnson
Retired Transportation Planner
Normal Heights, San Diego