

On behalf of the La Jolla Community Planning Association and several peer entities involved with La Jolla's planning, policies, and operations we endorse the broad stated goals of the proposed Complete Communities plan. However, we believe that the changes currently proposed to achieve those goals entail excessive, unnecessary, and counterproductive disruption of established norms and processes. These excesses can be corrected without diluting the stated goals. They should be corrected before the plan moves forward.

We applaud a goal clearly stated in the proposed Complete Communities plan, which is to increase the attractive housing options for average San Diegans whose choices are currently limited by the City's limited housing stock and generally high prices.

We deplore and cannot support a second goal less clearly stated but clearly implicit in the plan, which is to open coastal areas to construction of luxury high-rise apartment buildings.

The plan proposes three major changes to zoning requirements and processes in La Jolla.

1. It proposes that zoning within a certain distance from frequent transit routes—currently, as we understand it, within a mile of the existing 30 bus line—permit an FAR of 3.0 or 4.0.
2. It appears to propose, albeit implicitly, that within this same area the City could unilaterally and without voter approval relax the existing 30-foot height limit, which went into effect in 1976 after passage of Proposition D in 1972 and remains in force except for certain specific exceptions.
3. It proposes that coastal development and similar permits be issued ministerially by City staff, rather than require the current array of appealable City and community reviews and hearings.

Many of the parcels that would be affected by #1 and #2 are currently zoned RM 1-1. That zoning currently permits one housing unit per 3,000 square feet of land, and limits structures to an FAR of 0.75.

We have done some analysis of such parcels in a few sample areas, exploring how much additional housing could be built with RM 1-1 changes less Draconian than #1 and #2.

Our conclusion is that a few modest changes would dramatically increase the capacity of developers to add attractive, accessible housing in La Jolla. We recommend that the City Council adopt these more focused changes instead of #1-3 above. Specifically,

- A. We propose that zoning within a certain distance from frequent transit routes (perhaps a block or in any event less than a mile) permit an FAR of no more than 1.8.
- B. We propose that the 30-foot limit remain in effect.
- C. We propose that parcels currently zoned RM 1-1 within that same distance of frequent transit routes allow one housing unit for each 1,000 square feet of land.
- D. We propose that current City and community review processes remain as they are now.

It's useful to consider how this would affect a typical parcel with 50 feet of frontage and 150 feet deep—a size often found across the RM 1-1 parcels in La Jolla. (The proposed changes would have similar effects for 25x150 and 50x75 lots, which are also common.) Given current setback requirements (5 feet on each side, 15 feet front and back), a 50x150 parcel has $7500 - (150 \times 10) - (50 \times 30) = 4,500$ square feet of buildable land.

- At the current FAR limit of 0.75, that enables a structure of $7500 \times 0.75 = 5,625$ square feet, which would be an average of $5625/4500 = 1.25$ stories tall.
- An FAR of 1.8 would permit a structure with $7500 \times 1.8 = 13,500$ square feet of living space. This would stand an average of $13500/4500 = 3$ stories tall, which with 10-foot floor-to-floor spacing would just fit within the 30-foot limit (if roof structures such as solar panels made it a bit taller, the ground floor could be slightly below grade).
- A 13,500-square-foot structure could accommodate 3 very large apartments of 4,500 square feet, or six quite ample ones of 2,250 square feet, or eight units a bit smaller ($7500/1000 = 7.5$ units allowed per parcel, in our proposal #C; the City's rules allow such counts to be rounded up).

Currently the most a 50x150 RM 1-1 parcel could accommodate is two units just over 2,800 feet each. So the modest changes we propose would enable a very large increase in housing of various sizes and price points, with substantial but not drastic changes to neighborhood character.

Given these calculations, we cannot see how a need for increasing the supply of affordable, accessible housing near transit corridors requires overriding the well-established and much appreciated 30-foot limit on coastal construction.

One final note. We believe that proposal #2 above—allowing City staff to override the 30-foot limit—has nothing to do with increasing the supply of affordable, accessible housing. Instead, it stems entirely from the unstated goal to build luxury high-rise coastal buildings. The two goals do not align, the luxury-housing goal does not belong in Complete Communities, and the plan should clearly respect and maintain the 30-foot limit in the coastal zone.