



February 17, 2026

City of San Diego Planning Commission  
7650 Mission Valley Rd  
San Diego, CA 92108

**RE: 2026 Land Development Code Update**

Dear Chair Moden and Planning Commissioners,

On behalf of the undersigned coalition of stakeholders, we respectfully submit the below comments to the Planning Commission on the proposed items in the 2026 Land Development Code Update (LDC Update). Our coalition's members represent thousands of businesses and hundreds of thousands of employees in the City of San Diego. As such, we have a keen interest in regulatory changes that allow businesses to thrive, incentivize the construction of housing for our region's workforce, and make zoning adjustments that accommodate the evolving needs of our region, both for residential and commercial development. We deeply appreciate our ongoing partnership with the City's Planning Department to work together towards these goals. Below we highlight the specific items in the LDC Update that are priorities for our coalition and have divided them into three sections: items we currently support, items we currently oppose, and items we are reviewing and would support if amendments are made.

**IN SUPPORT OF:**

[#6: Complete Communities Housing Solutions- For-Sale Dwelling Units](#)

- This amendment is a welcome change that provides flexibility for new types of homes to be included in the CCHS program.

[#10: Old Town San Diego Planned District- Sidewalk Cafes](#)

- This amendment helps support the development of sidewalk cafes and active sidewalks in the Old Town Planned District, enhancing economic activity and allowing for business expansion.
- This also codifies operations that are currently occurring under extended COVID-19 pandemic sidewalk café regulations.

[#85: Appeal Fees: Project and Environmental Appeals](#)

- This would increase the appeal fee for project and environmental appeals, which will help prevent frivolous appeals.

#### #89: Public Right-of-Way Permits- Fiber Optic and Utility Equipment

- This provides streamlined installation of larger equipment cabinets in the right-of-way, eliminating unnecessary delays and allowing for the modernization of wireless equipment.

#### #93: Airport Land Use Compatibility Overlay Zone- Safety Compatibility for Child Care Centers in the Marine Corps Air Station (MCAS) Miramar Airport Influence Area Transition Zone

- This is a needed change to allow child-care centers near MCAS Miramar, providing child-care opportunities for an important segment of our City's workforce.

#### #94: Wireless Communication Facilities Regulations

- This would eliminate the need for Planning Commission approval for certain wireless communication facility applications.

#### #97 Promenades and Active Sidewalks - Relocating Accessible Parking Spaces

- This amendment encourages the development of sidewalk cafes and active promenades while maintaining accessible parking spaces within the same block.

#### #100 Encroachment Maintenance and Removal Agreements - Sidewalk Alternative Designs

- This amendment permits staff to remove an entitlement barrier, further encouraging applicants to develop and activate community sidewalks.

#### #103: Carmel Valley Planned District- Medical Offices

- This allows for medical offices in the Employment Center zone of Carmel Valley, expanding opportunities for medical services and bolstering an important sector of the City's economy.

#### #2: Downtown: Permit Process for Development within the Coastal Zone Overlay

- Helps streamline review of Downtown development within the Coastal Zone by reducing process level for certain sites from Process 2 to Process 1.

#### #5: Downtown: Increasing Homeownership Opportunities

- This is an example of incentivizing development to include for-sale housing by creating a new density bonus.

#### #6: Downtown: Small Lot Development Incentive

- This incentivizes development of smaller lots by creating a new density bonus and exemptions from certain development regulations.

#### #7: Downtown: Increasing Middle Income Housing

- This incentivizes the development of 100% middle-income housing Downtown via adjusting the existing Middle Income Housing density bonus.

#### #8: Downtown: C Street Revitalization Bonus

- Encourages development along underutilized C Street properties with an additional bonus of 100% of the FAR earned through other FAR bonus programs; this can help revitalize the C Street corridor by increasing housing supply or new commercial development.

#### #22: Downtown: Downtown Community Plan Minor Amendments

- Aligns the Downtown Community Plan with previously adopted Centre City and Gaslamp Quarter ordinance updates while removing outdated redevelopment and CCDC references and obsolete materials to reflect the current planning framework.

### #27: Downtown: Outdoor Activities

- Allowing outdoor activities by right makes it easier for businesses to activate spaces, driving foot traffic and increasing customer spending. Maintaining Temporary Use Permit requirements for live entertainment preserves oversight while still supporting flexible placemaking that strengthens Downtown's economy.

### **IN OPPOSITION TO:**

We respectfully request that these items be removed from this year's Land Development Code Update.

### #7: Complete Communities Housing Solutions- Development Impact Fee Waivers

- This amendment increases development costs by removing a DIF waiver for units under 500 square feet.
- Removing a DIF waiver for small units will not itself incentivize larger units to be built, it will simply make projects more costly and increase costs for tenants.
- Our coalition has joined the Building Industry Association in the submission of a compromise proposal that would preserve certain DIF waivers in this category while being mindful of the City's current budgetary situation.

### #9: Central Urbanized Planned District- Moving and Storage Facilities

- This amendment bans new moving and storage uses in a couple of specific corridors, partially on the basis of a future community plan update that is still in development.
- This policy sets a bad precedent, eliminating a specific business use from an area of the City with limited rationale.
- Moving and storage uses are essential assets to many residents and businesses who do not have the storage space necessary for their belongings or business supplies. Banning them in certain areas of the city creates hardship for residents and businesses alike by forcing long distances to access these storage facilities, as well as increasing the number of vehicle miles traveled to access these important facilities. We believe this item should be removed from the update.

### #91: Residential, Commercial, and Mixed Use Base Zones- Building Transitions and Buffers from Adjacent Freeways

- Adds Citywide angled transition plane requirements.
- This will eliminate developable land and reduce the amount of new housing in important areas of the City.
- We believe this should be reconsidered and brought back at a subsequent update after consultation with builders and designers.

### #31: Downtown: Limiting Reductions in Sidewalk Area for Vehicle Loading

- Prohibits curb line movement for the creation of passenger loading areas, which could prevent new projects from having loading zones.
- Passenger loading is important to both residents and businesses. Not having enough loading zones results in dangerous situations for people accessing ride share, and also for the delivery of goods. In areas of the city where there is insufficient loading zones, you already see double parking which creates traffic conflict and safety issues.
- This should be further considered in a subsequent update.

## **SUPPORT IF AMENDED:**

### #17: Setback Requirements-Fire Separation Distance

- This is an amendment to Residential Base Zone regulations to clarify that the fire code may require a greater setback in certain cases for health and safety purposes.
- Does this align with state law or go further?
- If further, why is this needed when numerous examples exist of safely accessible areas without this additional setback requirement?

### #29: Complete Communities Housing Solutions - Offsite Requirements

- This amendment narrows the ability for market rate units to create offsite affordable units, even though the current program has shown overwhelming success at creating both market rate and affordable housing.
- We appreciate Staff's decision to extend the 12-month timeframe, however, additional flexibility is still needed given current market conditions

### #39: Tentative Maps: When a Tentative Map is Not Required

- This item is intended to bring conformance with state law that allows tentative map exemptions for projects on commercial and industrial base zones.
- The language is unclear as it relates to the EMX base zone.
- We would request clarification that for the purposes of this change, the EMX zone would still qualify for a tentative map exemption.

### #68: MCAS Miramar Airport Land Use Compatibility Plan Consistency with Land Development Code

- Attempts to bring into conformance the allowed uses in the MCAS Miramar ALUCP and that of Table 132.14D.
- It appears one use was not delineated in the language included in the amendments under Item #68 that is conditionally allowed in the MCAS Miramar ALUCP.
- Specifically, Vehicle & Vehicular Equipment Sales & Services should be added to Table 132-15D which would make it consistent with Table MIR-1 of the MCAS Miramar ALUCP.
- There are no other conflicts given the limited applicability of this in that area, where no residences are allowed.

### #87: Previously Conforming Use Flexibility

- We appreciate staff's efforts to recognize difficult economic times and the need to allow existing tenants to continue in spaces they occupy.
- We also appreciate staff's recognition that community plan update changes may not reflect practical market conditions for numerous properties with long-standing existing uses.
- We would recommend, though, that the timeframe for allowing these previously conforming uses be extended beyond the proposed 15 years.
- We would also request that the proposal be extended to certain RM zones.

### #109: Energy Efficient Pool and Spa Heating Systems

- How does this interact with or how is this affected by County of San Diego pool and spa heating regulations?

- Is there cost effectiveness data on this regulation? Some electric pool heating technology is not commercially viable yet.

#30: Downtown: Traffic Calming at Garage Entrances

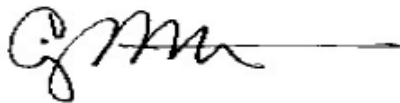
- Requires installation of speed-reducing measures on sloped driveways at parking garage exits.
- Is this technically feasible? Does this apply to all garages or just new projects?

Again, many thanks to staff for their efforts and to the Commission for their consideration of our feedback on the 2026 Land Development Code Update. Should you have any questions, please do not hesitate to contact us by email.

Sincerely,



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