



April 1, 2026

To: Senator Arreguin (Chair) and Senate Housing Committee Members
Re: SB-1117 Accessory dwelling units and junior accessory dwelling units.

Senators:

Neighbors For A Better San Diego (NFABSD) opposes SB-1117 unless amended as detailed below.

State and local laws continue to increase the number of ADUs that can be added to residential properties (both single-family and multi-family), without considering municipal infrastructure upgrades needed to support new development.

To address this infrastructure gap, NFABSD recommends that SB-1117 be amended such that the proposed 750 square foot exclusion would be applied to the total area of ADUs development on a premises rather than applying the threshold to each unit individually.

As an example, if a development adds two 600 square foot ADUs (i.e., one attached and one detached ADU, as allowed by current state law). Under SB-1117, no fees could be charged even though the development would add 1,200 square feet to the property and significantly increase the utilities load (power, sewer, water).

Conversely, if, as NFABSD proposes, SB-1117 is amended to apply the 750 square foot threshold to the total area of development, then the permitting jurisdiction could charge impact fees on the net 450 square feet of development (1,200-750).

Another important consideration is that applying a per unit threshold discourages the development of larger, multi-bedroom ADUs, which would provide family housing. Again, in the example above, building two 600 square foot one-bedroom units costs less to the developer than building a single 1,200 square foot three-bedroom unit. Removing this bias would not only promote family units, it would also encourage the development of these units in residential neighborhoods, including single-family neighborhoods, where families living in ADUs would have the greatest benefit, and fewer but larger units would impose less of a burden on infrastructure, parking, and other impacts.

Applying the threshold to collective development is especially important for San Diego, which allows bonus ADUs in excess of the state's current two ADU allowance. (As many as 4 additional ADUs on a single-family property and an unlimited number on multi-family properties.)

NFABSD's proposed amendment to the bill is as follows:

(c) (1) A local agency, special district, or water corporation shall not impose any impact fee upon the development of ~~an accessory dwelling unit that has 750 square feet of interior livable space or less or a junior accessory dwelling unit that has 500 square feet of interior livable space or less~~ **one or more accessory dwelling units and junior accessory dwelling units totaling 750 square feet of interior livable space or less.** Any impact fees charged for ~~an accessory dwelling unit that has~~ **accessory dwelling units and junior accessory dwelling units totaling** more than 750 square feet of interior livable space shall be charged proportionately in relation to the square footage of the primary dwelling ~~unit.~~ *unit, and only on the area in excess of 750 square feet of interior livable space.*

[Blue italics indicate changes proposed in current bill text. The additional changes recommended by NFABSD are highlighted in yellow.]

Respectfully,



Geoffrey Hueter, Chair
Neighbors For A Better San Diego