

Staff Response to “Report on Survey of Residents in Large Condominium Conversions in District Three” prepared by J Gregg Robinson, Ph.D.
(Staff comments provided in bold)

The report states “While I believe that the respondents interviewed in this study reasonably represent the members of the five complexes under consideration, it is possible that this group is not representative of the larger community of San Diego. Large projects in the third district could be different from large projects elsewhere in the city, or contrast with medium and small complexes.”

Staff agrees that the sample may not represent an accurate picture of conditions throughout the city.

Dr. Robinson suggests that the city should require EIRs for complexes over 25 units.
Staff bases the EIR determination on the potential for significant CEQA impacts.

According to the report, “The Hillcrest area in particular, with its large number of hospitals and clinics, seems to attract elderly and disabled residents. Moving them away from these institutions could increase traffic and parking pressures as these people return to make use of services not found elsewhere in our community.”

This statement seems to assume that a significant portion of the elderly and disabled Hillcrest residents currently walk to the hospitals and clinics, that they currently rent apartments and they will be displaced by condo conversions, and that medical services are not reasonably available in other parts of the city. No data is provided to support these assumptions.

Tables 7 and 8 address the self-assessment of 104 people (representing 104 units) regarding their risk of having to move in with friends or family because of a financial crisis, a housing crisis, or an illness, a fight with a roommate or objections of a landlord. Of the 104 household representatives surveyed, 34.3 percent (34 people) felt that they were likely or very likely to be forced to stay with friends or family members for at least a few weeks if they had to move. 13.2 percent (13 people) felt it was likely or very likely they would become homeless.

The report states “Not surprisingly the proportion of respondents who thought they were at risk of actual homelessness was much smaller. At 13%, however, and given the extremely large number of condominium conversions taking place in our community, the impact on service providers could be great.”

The report appears to contradict itself regarding the risk of homelessness. The report summary section states “At the extreme, the data in this study indicate a significant risk of homelessness on the part of at least 10% of the sample.”

The author acknowledges that the problem of homelessness may not have a direct impact on CEQA related issues, but states that it poses risks of indirect impacts,

such as the demand for social services including drug and alcohol addiction services, police intervention, park and public space utilization, etc.

Staff recognizes that such indirect impacts are possible, but believes that they are social, economic, and police issues rather than CEQA issues. Staff uses significance determination thresholds in evaluating all discretionary projects, including condominium conversions. The City's thresholds do not address social issues, and the thresholds state that police and park utilization are planning and facilities financing issues rather than CEQA issues.

Traffic and Parking: The report states "When upper middle class condo owners replace lower middle class apartment renters serious changes in traffic and parking are likely." Table 10 states that 6 people out of the 104 responders (5.8%) are planning to buy a condo in their current complex.

The report does not state whether any of the other 94.2% are planning to buy a condo in another building or a house, or intend to move for reasons other than economic.

The report states "Over half of all apartments have only a single car. This a very low level of car ownership compared to most middle class families."

Table 11 shows the number of cars per apartment (ranging from 0 to 5 cars) as reported by the 104 responders. No comparative statistics are given about the car ownership of "most middle class families."

Table 14 gives information on the number of parking spaces assigned to tenants (from 0 to 3 spaces) . A comparison with Table 11 (car ownership per apartment) shows that the number of assigned spaces is equal to the number of cars owned (101 responses received, 101 cars owned, and 101 spaces assigned).

The report states that new owners will have higher auto ownership rates; however no comparative data is provided to support this conclusion. Staff believes that the number of cars per tenant and owner will always be in flux as people move in and out and buy and sell cars.

Staff acknowledges that some of the older buildings do not have adequate parking. However, staff reviews projects in accordance with CEQA, which states that generally the baseline for analysis is the condition that exists at the time the analysis begins. No evidence has been presented to staff that the condo conversions result directly or indirectly in significant parking , traffic, or air quality impacts.

The report seems to contradict itself in saying: "Middle class families tend to be smaller in size than those with lower incomes, and they are less likely to live with roommates."

Assuming this is true (no factual basis for this conclusion was presented in the report), wouldn't it also be reasonable to conclude that those lower income people with larger families and more roommates would have more cars per unit?

Table 12 shows that 38.4% of the 104 responders use public transportation. The report admits that the questionnaire did not differentiate regular use from occasional use. The report also states that new owners of condos replacing the tenants will almost inevitably make less use of public transportation.

The report does not include any information on public transportation use by those people who currently own or who may purchase condominiums, so no comparison (and thus no reasonable conclusion) is possible. Many City staff ride the bus or trolley or coaster to work, and several occasionally take the trolley to football games or other non-work destinations.

Table 13 addresses the distance that 94 responders travel to get to work. The report states that nearly 60% of the sample are commuting five miles or less to work, and over 80% commute ten miles or less, and that most respondents report a willingness to move about 3 times farther away (15 miles) in order to find a comparably priced apartment (e.g., East County). This means that a significant proportion of these residents could be spending more time on area freeways.

Staff believes that it is equally likely that condominium owners also commute 5 miles or 10 miles or less to work, and that people who are unable to purchase condos in San Diego will move farther away (e.g., to East County) and will therefore have to drive longer distances to work.

The report states that "...the new owners replacing members of this sample will almost inevitably own more cars, drive longer distances, and make less use of public transportation. The current median price of a converted condo is over three hundred thousand dollars, meaning that the new residents will have the higher incomes that bring these kind of transportation problems."

No data was provided on the commute distances, car ownership, or public transportation use of people who currently own condos or who might buy converted condos. Without such data, no comparison or conclusion is reasonably possible.

The report concludes with "All of this implies that conversions could be contributing to traffic congestion, exacerbating parking problems, and decreasing the number of San Diegans using public transportation. While this data is not conclusive, it does suggest the need to study these issues in more depth.

Staff agrees that the data is not conclusive and believes that the entire report lacks any quantitative factual comparative data regarding condominium owners and potential condominium owners, and therefore no reasonable comparison is possible and the conclusions of the report are entirely speculative. In addition, the report is internally inconsistent. The author has supplied limited data about apartment renters, and has offered unsubstantiated opinions about the effects of condominium conversions on traffic congestion and parking problems. The data was gathered in a vacuum and no attempt was made to gather comparative data. Staff believes that these opinions are out of the author's area of expertise. In staff's opinion, the conclusions of the report are speculative and lacking any real context.

Staff believes that social and economic effects, both positive and negative, result from condo conversions; however, the author has not demonstrated any nexus between these effects and significant physical impacts on the environment as required in Section 15358(b) of the CEQA Guidelines.