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At the January 12th San Diego City Council's Land Use and Housing Committee (LU&H) meeting, the Planning Department presented a proposal for an entirely new and unproven transit-oriented development construct called **Sustainable Development Areas (SDAs)**. SDAs would replace Transit Priority Areas in San Diego's land use regulations and set a precedent to **radically redefine transit proximity for other SANDAG member municipalities.**

The SDA proposal, which has been embedded as one item in an omnibus Land Development Code update, relies on the questionable assumption that residents located a mile away from the nearest transit stop will have the same propensities to utilize transit as residents located within the half-mile distance currently assumed for Transit Priority Areas.

Allison Wood, Senior Regional Planner at SANDAG, read a statement in favor of the Planning Department's SDA proposal. Ms. Wood presented herself as speaking on behalf of SANDAG. Her commentary was clearly influential in the Committee's decision-making process. Before offering his motion to approve the proposed SDA definition and the other land development code updates, Councilmember Stephen Whitburn remarked on the significance of SANDAG's support for SDAs.

Ms. Wood's statement represents a significant deviation from SANDAG's long-standing policies on Transit-Oriented Development, such as a 5-minute walkshed (1/4-mile) for mobility hubs. Therefore, we would like SANDAG to clarify whether Ms. Wood was expressing an official SANDAG position on this policy. Our specific questions are as follows:

- Given that Ms. Wood represented her remarks at the January 12 meeting as official SANDAG policy, how and when was this decision made by SANDAG?
- Were Sustainable Development Areas considered and/or endorsed as an action of the SANDAG management, Board, or a subcommittee?

- Was SANDAG involved in the creation of the SDA map and what was the nature of that involvement?
- Is SANDAG's Transit Priority Area map based on the specific definition in San Diego's Land Development Code or the broader discretionary guidelines in State code?
- How will this radical redefinition of transit proximity affect other SANDAG member municipalities?

Contrary to Ms. Wood's public comments, the preponderance of transit studies and widely accepted practice show that residents **do not** utilize public transit in meaningful numbers beyond one-half mile walking distance to transit. (Note that the term "walking distance" is usually used to distinguish from radial or "crow flies" distance, but transit studies come to the same conclusions regarding transit adoption regardless of whether other forms of mobility are considered.) Organizations that have adopted the more realistic one-half mile walking distance standard include the U.S. Department of Transportation; U.S. Federal Transportation Administration; Federal Highway Administration; San Diego Metropolitan Transit System; California Department of Housing and Community Development; and heretofore **even SANDAG**.

We know that most people will not walk beyond one-half mile (10-minute walkshed) to transit based on overwhelming professional and academic research. Therefore, building dense housing up to one mile from transit instead of the accepted distance of one-half mile will knowingly deter mass transit adoption and reinforce automobile dependency in San Diego. The SDA proposal, therefore, raises serious questions about San Diego's Climate Action Plan, regional transit planning, and VMT reduction.

We understand the need for housing in the city of San Diego, but that does not justify distorting transit-oriented design principles as a cover for broad de-regulation of San Diego's zoning. This is especially true when San Diego already has a zoned capacity (Adequate Sites Inventory) of over 206,000 new housing units with the recent completion of the Mira Mesa community plan update, twice San Diego's RHNA goal (108,000). Pending community plan updates will add over 100,000 more potential units to this total. Beyond the formal upzoning of community plan updates, Complete Communities provides the capacity for over 1.1 million new housing units. Further, ADUs and SB 9 provide the capacity to build hundreds of thousands of additional units, without transit incentives or expansion of SDAs/TPAs.

So that the public has time to review SANDAG's documentation and deliberations behind this substantial policy shift prior to the upcoming City Council vote, **we ask that you respond to our inquiries by January 27**, including all graphic information system (GIS) data and files related to TPAs and SDAs, if applicable, and any documentation supporting the extension of SDAs/TPAs to one mile path of travel from transit.

Respectfully,

Geoffrey Hueter
Chair, Neighbors For A Better San Diego

CC: SANDAG Board of Directors