



Critique of San Diego's Transit Priority Area Map

Executive Summary

Since the inception of SB 743, the City has ignored the State's intention for Transit Priority Areas (TPAs) to be based on walking distance. CA Section 65088.4 (a) specifically says:

65088.4 (a) It is the intent of the Legislature to balance the need for level of service standards for traffic **with the need to build infill housing** and mixed use commercial developments **within walking distance of mass transit facilities**, downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes competing needs.

That brings us to another important point. The City has three different definitions of its Transit Priority Area available to the public right now. One is in the municipal code; one is the online 5/16/22 map; the third is the ArcGIS map. They each refer to different sections of federal code, different planning horizons, different transportation plans, etc. The only thing they have in common is that they refer to a TPA being "within one-half mile" of a major transit stop (with an outdated definition) without referring to walking distance as intended by CA code 65088.4(a).

The technology to map walking distance has existed for years. Google Maps has had it for at least a decade and ArcGIS has had it for 20 years, so it is misleading to say that the technology has suddenly made this possible for the Planning Department. Neighbors For A Better San Diego created walking distance TPA maps in late 2021 and we're merely a volunteer group of neighbors.

At this time, we respectfully request that as part of the 2023 code update, the City adopt one definition of transit priority areas, that it be based on ½ mile **walking distance** as prescribed by SB 743 and as originally proposed by the Planning Department as part of the 2022 LDC Update, and that it be linked to major transit stops in the **transit improvement program** with a 4-5 year planning horizon, which will allow projects built within the TPA the greatest chance to be eligible for state grant funds.

San Diego has ignored the state's intention for Transit Priority Areas to be ½ mile walking distance from transit.

- **SB 743 established transit priority areas (TPAs) on 9/27/13**

“Transit priority area” means an area **within one-half mile of a major transit stop** that is existing or planned, if the **planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program** adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” SB743 (TIP)

- **The bill made clear the legislature's intention that TPAs were to be ½ mile walking distance:**

65088.4 (a) It is the intent of the Legislature to balance the need for level of service standards for traffic **with the need to build infill housing** and mixed use commercial developments **within walking distance of mass transit facilities**, downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes competing needs.

San Diego currently has three different, conflicting TPA definitions available.

- **All refer to “within one-half mile”**
 - **Some refer to Transportation Improvement Program (TIP), to Regional Transportation Plan (RTP) or both**
 - **One refers to Section 21099; one to 450.216 or 450.322; one to only 450.322**
 - **One has 4 year planning horizon; one has 4 and 20 year; one has 20 year**
 - **Differences and errors highlighted on attached timeline**

- **Municipal Code**

Transit priority area means the area defined in California Public Resources Code **Section 21099**, as may be amended, or an area **within one-half mile** of a major transit stop that is existing or planned, if the planned major transit stop is scheduled to be completed within the planning horizon included in a **Transportation Improvement Program**.

<https://docs.sandiego.gov/municode/MuniCodeChapter11/Ch11Art03Division01.pdf>

- **City of San Diego Published TPA Map 5/16/22**

The Transit Priority Areas map is based on the adopted SANDAG San Diego Forward Regional Plan (2021 **RTP**)

In accordance with SB 743, “Transit priority area” means “an area **within one-half mile** of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a **Transportation Improvement Program** adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.”

- Section 450.216 addresses development and content of the statewide transportation improvement program. STIPs cover a period of no less than four years.
- Section 450.322 refers to the development and content of a metropolitan transportation plan. The **RTP** has at least a 20-year planning horizon.

- Major Transit Stop, as defined in Section 21064.3, means: “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods.”

<https://www.sandiego.gov/sites/default/files/transit-priority-map.pdf>

- **City of San Diego ArcGIS TPA Map 2/7/23**

In accordance with SB 743, “Transit Priority Areas” are defined as “an area **within one-half mile** of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a **Transportation Improvement Program** (5 year horizon – often budgeted or funded) adopted pursuant to Section 450.322 of Title 23 of the Code of Federal Regulations.”

- Section 450.322 refers to development and content of the metropolitan transportation plan. The RTP has at least a 20-year planning horizon.
- Major Transit Stop, as defined in Section 21064.3, means: “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods.”

<https://webmaps.sandiego.gov/portal/apps/webappviewer/index.html?id=4efd01a2e06246adb36122fcf136f95d>

- **The mistakes and discrepancies between these three San Diego TPA definitions and maps need to be resolved and reflect the intent of state law and the 4-5 year transit improvement program planning horizon that will maximize state grant funding to help supplement San Diego’s infrastructure shortfall.**

The technology to map walking distance is not new and should never have been used as an excuse to map TPAs “as the crow flies.”

- Google Maps has had this capability for at least a decade.
- Our mapping specialist confirms that ArcGIS has had this capability for **20 years**.
- Neighbors For A Better San Diego has been working with ArcGIS generated walking distance TPA maps for San Diego since late 2021.

Below is a timeline of the San Diego Transit Priority Area development along with details of changes and inaccuracies.

DATE	LEGISLATION / DOCUMENT	CODE IMPACTED	CHANGES v PREVIOUS ITERATION	NOTES
9/27/13	SB743 CREATES TPA	CA CODE	“Transit priority area” means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is	65088.4 (a) It is the intent of the Legislature to balance the need for level of service standards for traffic with the need to build infill housing and mixed use commercial developments within walking distance of mass transit

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			scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." SB743 (TIP)	facilities , downtowns, and town centers and to provide greater flexibility to local governments to balance these sometimes competing needs.
Current Municipal Code (6/21/18)	City of San Diego Municipal Code Chapter 11, Article 3, Division 1, Page 28 SOURCE: https://docs.sandiego.gov/municode/MunicipalCode/Chapter11/Chapter11Article3/Division01.pdf	Local Codes and Implementation of State Codes	<i>Transit priority area</i> means the area defined in California Public Resources Code Section 21099 , as may be amended, or an area within one-half mile of a <i>major transit stop</i> that is existing or planned, if the planned <i>major transit stop</i> is scheduled to be completed within the planning horizon included in a Transportation Improvement Program .	CA PRC 21099: "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.
5/16/22	City of San Diego Published TPA Map https://www.sandiego.gov/sites/default/files/transit-priority-map.pdf	Local Codes and Implementation of State Codes	The Transit Priority Areas map is based on the adopted SANDAG San Diego Forward Regional Plan . In accordance with SB 743, "Transit priority area" means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation	SANDAG-based TPA-based ½-mile "as the crow flies" INCONSISTENT WITH WRITTEN INTENT OF SB743 SECTION 450.216 REFERS TO STATEWIDE TRANSPORTATION PLAN WITH MINIMUM 20-YEAR FORECAST. SECTION 450.322 DOES NOT MENTION RTP (REGIONAL TRANSPORTATION PLAN) OR A 20-YEAR PLANNING HORIZON.

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			<p>Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."</p>	<p>SECTION 21064.3 IS MISSING THE FOLLOWING "an existing rail or bus rapid transit station"</p>
<p>Currently online (as of 2/8/23)</p>	<p>City of San Diego TPA Map</p> <p>SOURCE: https://webmaps.sandiego.gov/portal/app/webappviewer/index.html?id=4efd01a2e06246adb36122fcf136f95d</p>	<p>Local Codes and Implementation of State Codes</p>	<p>The Transit Priority Areas map is based on the adopted SANDAG San Diego Forward Regional Plan.</p> <p>In accordance with SB 743, "Transit priority area" means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."</p> <ul style="list-style-type: none"> • Section 450.216 addresses development and content of the statewide transportation improvement program. STIPs cover a period of no less than four years. • Section 450.322 refers to 	<p>TPA-based</p> <p>½-mile "as the crow flies" INCONSISTENT WITH WRITTEN INTENT OF SB743</p> <p>SECTION 450.216 IS REMOVED</p> <p>SECTION 450.322 DOES NOT MENTION RTP (REGIONAL TRANSPORTATION PLAN) OR A 20-YEAR PLANNING HORIZON.</p> <p>SECTION 21064.3 IS MISSING THE FOLLOWING "an existing rail or bus rapid transit station"</p>

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			<p>development and content of the metropolitan transportation plan. The RTP has at least a 20-year planning horizon.</p> <ul style="list-style-type: none"> Major Transit Stop, as defined in Section 21064.3, means: “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods.” 	
9/14/22	City of San Diego DRAFT LCD MATRIX/CODE	113.0103	<p><i>Transit priority area</i> means the area defined in California Public Resources Code Section 21099, as may be amended, or and an area within a 15-minute walking distance on a pedestrian path of travel at an average of three miles per hour that extends no more than one-half mile from a major transit stop that is existing or planned, if the planned major transit stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or</p>	<p>TPA-based</p> <p>½-mile walking distance</p> <p>No SDA</p> <p>Moves from current TPA definition of “planning horizon included in a Transportation Improvement Program” to add “or applicable regional transportation plan.”</p>

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			applicable regional transportation plan.	
9/27/22	City of San Diego COMMUNITY PLANNERS COMMITTEE – LDC UPDATE PRESENTATION	113.0103	<i>Transit priority area</i> means the area defined in California Public Resources Code Section 21099, as may be amended, or and an area within a 15-minute walking distance on a pedestrian path of travel at an average of three miles per hour that extends no more than one-half mile from a major transit stop that is existing or planned, if the planned <i>major transit stop</i> is scheduled to be completed within the planning horizon included in a Transportation Improvement Program or applicable regional transportation plan.	TPA-based ½-mile walking distance No SDA