



Sustainable Development Areas and Transit Equity

Executive Summary

Distance is often the greatest barrier to access. Making Sustainable Development Areas (SDAs) one mile from transit raises equity issues by encouraging affordable housing beyond a reasonable walking distance for the people who need it most. 20% of people at or below the federal poverty line don't have access to a car, and auto ownership is even lower among low-income minorities.³ Locating dense and affordable housing beyond one-half mile from transit presents real challenges for low-income households, communities of color and people with disabilities.

SANDAG's 2017 Regional Mobility Hub Implementation Strategy Equity Considerations report acknowledges that "Transit is likely the mode of transportation that people most associate with equity." It further notes that older adults often stop driving, so mobility hub features that focus on driving "may not provide proportional benefits to disadvantaged populations...Seniors and people with disabilities often have a more limited range of travel if they are walking or biking." These observations point to a strategy of providing housing for these populations closer to transit, within $\frac{1}{4}$ to $\frac{1}{2}$ mile walking distance, as opposed to beyond $\frac{1}{2}$ mile to 1 mile as proposed by the Planning Department. Beyond $\frac{1}{2}$ mile, housing is no longer considered transit-oriented development – not by HCD or essentially any other government or professional transportation organization.

To address these inequities, SANDAG's Draft 2021 Regional Plan calls for improved transit access in areas with low-income and minority residents – that would be closer transit access for more low-income and minority residents, not an SDA a mile from transit.

Building dense and affordable housing realistically near transit not only supports low-income households, but it also increases the return on investment for local governments and transit operators who are financially supporting transit infrastructure. In short, San Diego will receive the greatest social benefit and transit viability if it puts affordable housing opportunities closer to transit, not up to a mile away as the City's Planning Department proposes for Sustainable Development Areas.

Transit Users and Equity

Research shows, and federal program guidelines reflect, that the average person is typically willing to walk a quarter-mile to access bus service and a half-mile for rail.¹

- California Department of Housing & Community Development’s (HCD) definition of transit-oriented development (TOD) “requires homes to be built within a ¼ mile radius of a qualifying rail or ferry station or a bus stop with frequent service.”²
- SANDAG’s 2017 Regional Mobility Hub Implementation Strategy Equity Considerations supported this proposition with its “five-minute walkshed (about a quarter of a mile) around the station.”⁴

Making SDAs one mile from transit raises equity issues by encouraging affordable housing beyond a reasonable walking distance for the people who need it most.

- “Transit is likely the mode of transportation that people most associate with equity.”⁴
- 20% of people at or below the federal poverty line don’t have access to a car, and automobile ownership is even lower among low-income minorities.³
- Locating dense and affordable housing beyond one-half mile from transit presents real challenges for low-income households, communities of color and people with disabilities.³
 - Older adults often stop driving, so mobility hub features that focus on driving “may not provide proportional benefits to disadvantaged populations”⁴
 - “Seniors and people with disabilities often have a more limited range of travel if they are walking or biking”⁴

These observations point to a strategy of providing housing for these populations closer to transit, within ¼ to ½ mile walking distance, as opposed to beyond ½ mile to 1 mile as proposed by the Planning Department. Beyond ½ mile, housing is no longer considered transit-oriented development – not by HCD or essentially any other government or professional transportation organization.

Who Rides San Diego Transit?


Transit is more affordable than other long-distance transit modes, and low-income households are generally more likely to use it.² San Diego’s 2022 Metropolitan Transit System Customer Satisfaction Survey Results⁵ confirm these assumptions:

- 84% of its riders earn < \$50K/year
 - 55% earn < \$20K/year

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Customer Profile

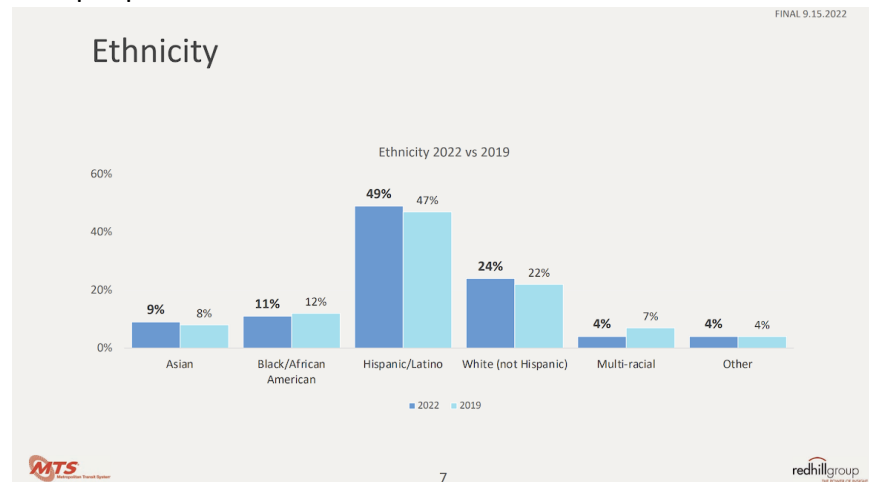
- Annual income less than \$50K (84%)
- Annual income less than \$20K (55%)
- More likely to be Hispanic (49%)
- Speak a language other than English at home (36%)
 - and of those 61% speak English “well” or “very well”
- Smartphone availability (91%)



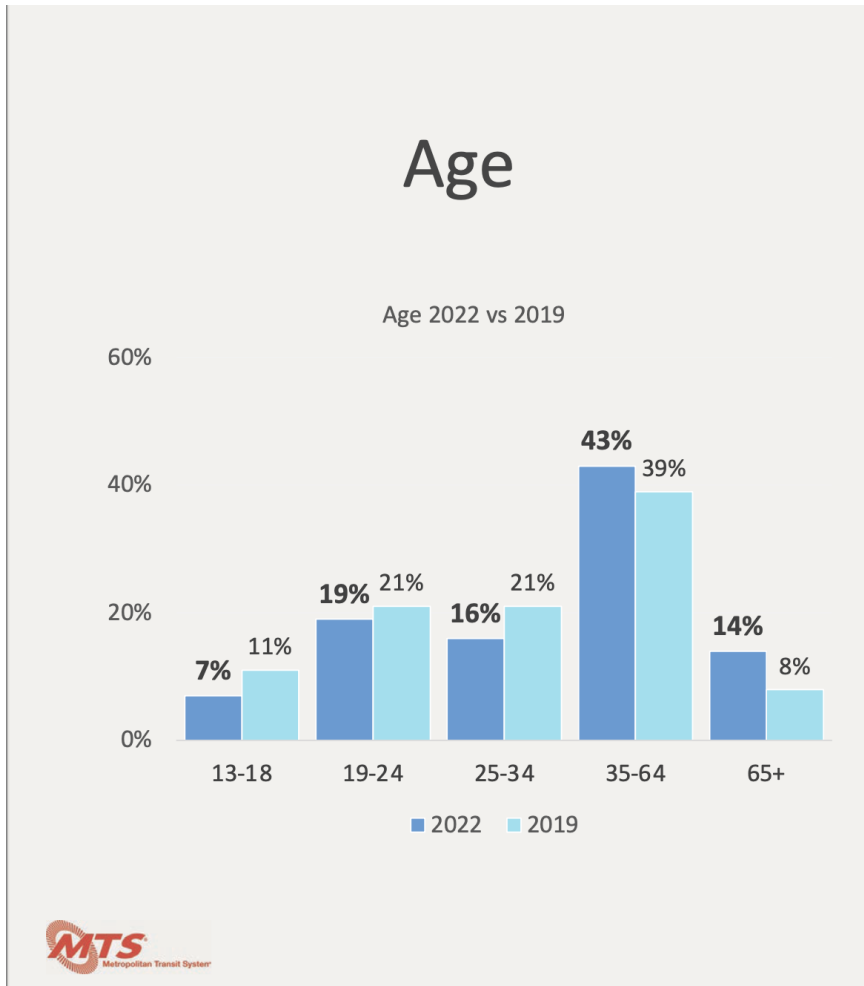
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redhillgroup
THE POWER OF PEOPLE

- 76% are people of color



- 14% are 65+




- 12% of its riders are disabled


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Customer Profile

- Use Bus (74%)
- Trolley (81%)
- Ride MTS at least 3 times a week (80%)
- 86% complete their trip with one or less transfers
- Half of riders complete their trip without a transfer
- Vehicle availability (30%)
- Employed (61%)
 - Full-time 38%
 - Part-time 23%
- Student (26%)
- Disability (12%)



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SANDAG's Social Equity Analysis for Draft San Diego Forward: The 2021 Regional Plan indicates:

- 11.8% of low-income residents,
- 10.4% of minorities, and
- 8.0% of seniors in the region live within 0.5 miles of high-quality transit.¹²

To address these inequities, SANDAG's Draft 2021 Regional Plan calls for improved transit access in areas with low-income and minority residents¹² – **that would be closer transit access for more low-income and minority residents, not an SDA a mile from transit.**

What Does San Diego's Housing Element Say About Transit?

San Diego's 6th Cycle Housing Element identifies housing capacity to affirmatively further fair housing opportunities for all San Diegans. It does so primarily on sites located **near transit and in walkable areas (HE-15), consistent with the General Plan and Climate Action Plan.**⁷

- Policy HE-I.4 calls for emphasizing the need for affordable housing options for seniors and people with disabilities and/or special needs **near transit**, healthcare services, shopping areas, and other amenities.
- Policy HE-I.9 encourages micro-unit housing and new shared and intergenerational housing models to help meet the housing needs of aging adults, students, and lower income individuals, and **promote their development within TPAs citywide [not 1 mile from transit].**

Multiple factors contribute to disproportionate housing needs. Among them is the disconnection between jobs and housing. When there is a lack or imbalance of affordable housing near the job centers within the city and the region, this affects the income and opportunities for lower income, non-white and disabled populations.

Access to public transit is of paramount importance to households affected by low incomes and rising housing prices. Public transit should strive to link lower income persons, who are often transit dependent, to major employers where job opportunities exist. Access to employment via public transportation can reduce welfare usage and increase housing mobility, which enables residents to locate housing outside of traditionally low-income neighborhood.⁹ The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice. Persons who depend on public transit may have limited choices regarding places to live. In addition, seniors and disabled persons also often rely on public transit to visit doctors, go shopping, or attend activities at community facilities. Public transit that provides a link between job opportunities, public services, and affordable housing helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs.¹⁰

Having access to quality jobs and effective public transportation helps facilitate a good quality of life and improved life outcomes. Unfortunately, research has shown that racial and ethnic minorities, individuals with disabilities, and other protected classes often have restricted access to these vital amenities.¹²

Limited access to public transit may counteract some of the benefits of affordable housing. Current research indicates a strong connection between housing and transportation costs. Housing market patterns in parts of California with job-rich city centers are pushing lower-income families to the outskirts of urban areas, where no transit is available to connect them with jobs and services. In lower-income communities with underserved city centers, many residents must commute out to suburban job-rich areas. In an attempt to save money on housing, many lower-income households are spending disproportionately higher amounts on transportation. A study conducted by the Center for Housing Policy revealed that families who spend more than half of their income on housing spend only eight percent on transportation, while families who spend 30 percent or less of their income on housing spend almost 24 percent on transportation.¹¹ This equates to more than three times the amount spent by persons living in less affordable housing.¹⁰

- San Diego Housing Element 2021-2029 suggests meaningful fair housing programs:
 - update opportunities **along [not 1 mile away from]** new planned transit routes and to consider greater equity factors (HE-A-236)
 - Create a Large Family Unit affordable housing incentive program encouraging 3-bedroom units in **quality transit areas** (HE-A-242)
- In 2020, the City Council adopted Complete Communities: Housing Solutions and Mobility Choices.
 - **“Intended to increase housing production in areas located closest to transit**, and to provide more pedestrian, cyclist, and transit investments, particularly in areas with the greatest needs, and where such investments

would serve the most people... resulting in critical GHG emissions reductions.” pg 58⁸

The forthcoming Environmental Justice Element of the General Plan is supposed to guide the City’s future planning and development actions to ensure fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies. This appears contrary to increasing the distance to transit with one mile SDAs making lower income, minority, and disabled residents and seniors live further from the transit they rely upon for job opportunities, public services, shopping, medical care, etc.

What Does the California Household Travel Study Teach Us About Transit Equity?

In 2014, Transform and The California Housing Partnership Corporation (CHPC) conducted a Caltrans’ California Household Travel Study (CHTS) data analysis. They used the California Department of Housing & Community Development’s (HCD) definition of transit-oriented development (TOD) that “requires homes to be built within a ¼ mile radius of a qualifying rail or ferry station or a bus stop with frequent service.”²

The study found that “Households living in HCD TOD areas [¼ mile from transit] use transit at rates that are triple or quadruple the rates of households living in non-TOD areas. Transit usage is even higher for the groups making less than 50% of median income. Extremely Low Income and Very Low Income households living in a HCD TOD take transit 50% more than their neighbors from higher income brackets. What this tells us is that putting affordable housing within ¼ mile of transit will help bolster transit usage and the people who need transit.

The Transform study also showed that “extremely Low-Income households own only .7 vehicles per household in HCD TOD areas versus 1.65 vehicles for High Income households in the same area. Finally, “lower income households have relatively high car ownership when they lack access to transit.”² The moral of the story is to put affordable housing opportunities **closer to transit, not up to a mile away as the City’s SDAs propose.**

Conclusions

Those who rely on San Diego transit are primarily lower income, minority individuals, many seniors and people with disabilities. SANDAG research indicates that within the region only 11.8% of low-income residents, 10.4% of minorities and 8% of seniors live within ½ mile of high quality transit.¹² To address these inequities, SANDAG is calling for improved transit access in areas with low-income and minority residents. This would suggest putting more affordable and dense new housing closer to transit, not further away as the one mile SDAs would allow. This would be consistent with the intention of Complete Communities to create housing “**closest to transit**” as reinforced in the Climate Action Plan.⁸

Access to quality jobs and effective public transit facilitates quality of life and improved life

outcomes, but research indicates that racial and ethnic minorities, individuals with disabilities, and other protected classes often have restricted access to these vital amenities.¹² People dependent upon mass transit may have limited housing choices. In addition, seniors and disabled persons also often rely on public transit to visit doctors, shop, or attend community activities. Public transit provides a link between job opportunities, public services, and affordable housing and helps to ensure that transit-dependent residents have adequate opportunity to access housing, services, and jobs. **The lack of a relationship between public transit, employment opportunities, and affordable housing may impede fair housing choice.**¹⁰ Expanding distance to transit for transit-oriented development, especially affordable housing, with a one mile Sustainable Development Area (SDA), will defeat equity goals and harm the people who most need access to both transit and affordable housing choices.

Sources

1 Federal Transit Administration, “Final Policy Statement on the Eligibility of Pedestrian and Bicycle Improvements Under Federal Transit Law,” *Federal Register* (2011), available at <https://federalregister.gov/a/2011-21273>.

2 <https://chpc.net/resources/why-creating-and-preserving-affordable-homes-near-transit-is-a-highly-effective-climate-protection-strategy/>

3 Center for American Progress, “Can New Transportation Technologies Improve Equity and Access to Opportunity?,” Kevin DeGood and Andrew Schwartz, April 2016, <https://www.americanprogress.org/wp-content/uploads/2016/04/TransportEquity1.pdf>

4 <https://www.sandag.org/-/media/SANDAG/Documents/PDF/projects-and-programs/innovative-mobility/mobility-hubs/mobility-hub-planning-resources/mobility-hub-equity-considerations-2017-12-15.pdf>

5 https://www.sdmts.com/sites/default/files/attachments/mts-customer-satisfaction-survey-results-09-15-2022_mts-board_final_0.pdf

6 <https://www.huduser.gov/portal/pdredge/pdr-edge-trending-051722.html#:~:text=Overall%2C%20%20percent%20of%20the,across%20the%20cities%20is%20uneven.>

7 City of San Diego Housing Element 2021-2029 https://www.sandiego.gov/sites/default/files/he_final_screen_view_june2021.pdf

8 City of San Diego 2022 Climate Action Plan; https://www.sandiego.gov/sites/default/files/san_diegos_2022_climate_action_plan_0.pdf

9 Ong, Paul and Evelyn Blumenberg, "Job Accessibility and Welfare Usage: Evidence from Los Angeles". UCLA Department of Policy Studies, (1998).

10 <https://sdfairhousing.org/wp-content/uploads/2022/12/Regional-Analysis-of-Impediments2020.pdf>

11 Sard, Barbara and Rice, Douglas. "Creating Opportunity for Children How Housing Location Can Make a Difference". Center on Budget and Policy Priorities. (October 2014).

12 Appendix HE-A – Assessment of Fair Housing for the City of San Diego’s 2021-2029 Housing Element
https://www.sandiego.gov/sites/default/files/he_appa_assessmentfairhousing_final.pdf