



**Circulate San Diego**  
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February 12, 2019

Chair Georgette Gómez  
Board of Directors  
Metropolitan Transit System  
1255 Imperial Avenue, Suite 1000  
San Diego, CA 92101

**RE: Support for MTS' Proposed Joint Development Program**

Chair Gómez,

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing in support of the proposed Joint Development Program implementation procedures for Board Policy 18 to be presented at the Board of Directors meeting on February 14<sup>th</sup>.

Circulate released its report<sup>1</sup> on how to transform empty parking lots owned by MTS into housing with three main recommendations: to issue regular requests for proposals for priority sites, require a percentage of new developments be made affordable, and eliminate the requirement for new developments to replace underutilized parking.

The proposed MTS Joint Development Program implements Circulate recommendations. It proposes to issue annual requests for qualifications of priority sites, which will be determined in part by the property's zoned capacity. It requires a minimum of 20 percent of units be deed restricted affordable homes.

While the language regarding parking replacement meets our shared intent to maximize the developable density and provide alternatives to driving, it does not provide specific guidance that would ensure new developments are not overparked. Circulate recommends that the implementing document state that replacement parking be no greater than current parking lot utilization, based on regular counts conducted by MTS. Additional studies or analysis should not be necessary to determine the replacement parking requirements.

MTS staff and the Board have demonstrated their leadership to address San Diego's most pressing issues through Policy 18 and the Joint Development Program implementing procedures. Circulate applauds MTS' efforts to provide more housing regionally near transit.

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<sup>1</sup> Circulate San Diego, Real Opportunity (April 25, 2018), available at <http://www.circulatesd.org/realopportunity>.

Sincerely,



Maya Rosas  
Director of Policy  
Circulate San Diego

CC:

Paul Jablonski, Chief Executive Officer, MTS  
Sharon Cooney, Chief of Staff, MTS  
Tim Allison, Manager of Real Estate Assets, MTS