



January 23, 2015

SANDAG

Board of Directors, Chair Jack Dale
Transportation Committee, Chair Todd Gloria
Regional Planning Committee, Chair Lesa Heebner
401 B St. Ste. 800
San Diego, CA 92101

RE: SANDAG's Regional Transit Oriented Development Strategy

Honorable Jack Dale and SANDAG Board and Committee members:

On behalf of Circulate San Diego, I would like to thank SANDAG for continuing to develop a Transit Oriented Development (TOD) Strategy.

With urging from Circulate San Diego's predecessor organizations, the SANDAG Board committed in the Fall of 2011 to "Implementing an action to develop a regional transit-oriented development policy in the 2050 RTP Sustainable Communities Strategy to promote and incentivize sustainable development."

SANDAG's Transit Oriented Development Forum organized for January 27th and 28th is an important step to developing a TOD Strategy that promotes smart growth. Circulate San Diego appreciates this effort, and strongly encourages SANDAG to engage stakeholders in a meaningful dialogue on these issues:

I. SANDAG has a wide set of land use responsibilities that can be leveraged to support transit oriented development.

Recently, some SANDAG Board members have expressed in public meetings a view that SANDAG is only a body concerned with transportation policy, and not land use. While local governments do have a primary role in determining local land use decisions within their jurisdictions, SANDAG policies play an important role to incentivize, fund, and prioritize local land use decisions.

Circulate San Diego hopes that SANDAG's TOD Forum, and the development of a TOD Strategy, will help the entire SANDAG Board appreciate the value of its land use role. The role SANDAG plays in land use is fundamental, required by statute, and has been affirmed by the voters of San Diego County.

- **SB 375:** State law now requires Metropolitan Planning Organizations (MPO) like SANDAG to establish sustainable communities strategies. These strategies must contain plans that reduce greenhouse gas emissions by employing not only transportation policies, but also housing and land use plans.
- **Housing Element Law:** California state law requires that Councils of Government, such as SANDAG, allocate the region's share of growth through a periodic Regional Housing Need Allocation Plan. Cities must adopt housing elements consistent with these plans, which determine land use density, growth patterns, and where San Diegans will live in the future.
- **San Diego Forward:** SANDAG is currently undergoing a process called "San Diego Forward," to update its Regional Transportation Plan/Sustainable Communities Strategy, and its Regional Comprehensive Plan. Key to success for San Diego Forward is a recognition of SANDAG's role in

land use through preserving open space, and encouraging smart growth development in its own Smart Growth Concept Map.

- **TransNet:** In 2004, voters in San Diego County extended a voter-approved sales tax measure which dedicated \$280 million to SANDAG to finance a Smart Growth Incentive program. According to the TransNet ballot language adopted by voters, those funds are intended for SANDAG to “assist local agencies in better integrating transportation and land use.”

SANDAG is more than a transportation agency. Land use policy is a core part of its function and the benefit it provides to the region.

II. SANDAG has a wide range of tools available to support smart growth and transit oriented development.

Regional planning organizations can and should play an important role to help constituent governments implement local housing and land use policies. MPOs have a wide variety of resources that can be used to encourage land use that is compatible with transportation investments.

In December 2014, Transportation for America released a report titled “The Innovative MPO.” That report outlined how MPOs in other regions go beyond transportation planning and use land use strategies, funding flexibility, and other tools to advance their region’s interests. “The Innovative MPO” is available at <http://t4america.org/maps-tools/the-innovative-mpo>.

III. Transit-oriented development strategies can help SANDAG’s transportation investments succeed.

Circulate San Diego believes that a smart TOD Strategy will help SANDAG maximize the benefits to San Diego from its transportation investments.

Through federal and state funds, as well as TransNet, SANDAG is planning to add significant improvements to the region’s transportation network. SANDAG can follow the example of MPOs in other regions, like the One Bay Area Grant Program (pg. 82, “The Innovative MPO”), and adopt funding priorities that tie transit investments to cities’ willingness to adopt effective land uses.

More recommendations for adopting a smart TOD Strategy can be found in the Regional Transit Oriented Development Guiding Principles document, released by Circulate San Diego’s predecessor organization in 2013 (http://www.circulatesd.org/download_file/view/554/296/).

Circulate San Diego is committed to engaging in SANDAG’s ongoing TOD policy planning. We look forward to engaging in a productive dialogue over how SANDAG can both innovate, and adopt policies that have proven to work in other regions.

Sincerely,



Colin Parent
Policy Counsel, Circulate San Diego

Attachments:

- Circulate San Diego, “[Regional Transit Oriented Development Guiding Principles](#),” July 2013
- Transportation for America, “[The Innovative MPO](#),” December 2014