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October 7, 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: Final Comments for SANDAG's Draft Transit Oriented District Strategy.

Honorable Jack Dale and SANDAG Board and Committee members:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to provide final comments to SANDAG's Draft Transit Oriented District Strategy.

**1. It is more important than ever for SANDAG to create a meaningful TOD policy.**

Local governments in San Diego have made great strides focusing land uses near our region's transit investments.

However, more work is needed. In 1990, SANDAG projected multi-family housing to make up 52 percent of new development. In 2013, after local governments made different land use decisions, 82 percent of future development is projected to be multi-family. This change demonstrates the vital need for a useful TOD policy.

**2. The San Diego region must focus on TOD to remain competitive for Federal and State transportation funding.**

As outlined in Circulate San Diego's report [TransNet Today](#), Federal and state sources of funding are increasingly shifting toward large competitive grant structures. The State Cap-and-Trade funds, and Federal TIGER Grants are two significant examples.

These programs require applicants to show that transportation investments will serve adequate population densities, and will provide sufficient return on investments. For the San Diego region to remain competitive for these types of funding, SANDAG must help localities prepare for TOD.

### **3. Circulate San Diego appreciates the efforts to create a timeline for implementing elements of a TOD Strategy.**

Circulate San Diego [wrote earlier to express our concern](#) that the [initial draft of SANDAG's TOD Strategy](#) presented by SANDAG staff at the SANDAG Technical Working Group (TWG) on Thursday July 9, 2015, contained no actionable policy changes.

In response, SANDAG staff [prepared an updated document](#) which included “Key Early Actions,” to be completed this year or in upcoming years. With each of the eight recommended actions, parties responsible for taking the lead are listed. These include SANDAG, local jurisdictions, transit agencies, and developers.

Among the eight early action items is the recommendation to develop a TOD readiness tool to “evaluate the readiness of TOD sites and districts.” This has continuously been supported by San Diego planners and developers in order to evaluate areas’ TOD readiness, including market demand, parking ratios, connectivity to transit and other important gauges. Circulate San Diego supports this recommendation as a means to develop a scoring mechanism for a new or modified TOD grant program.

Overall, the Key Early Actions represent an improvement to the original draft strategy. Circulate San Diego is committed to working with SANDAG and other agencies in the San Diego region to help implement these early actions.

### **4. SANDAG should adopt a Key Early Action to provide a point-of-contact for the Affordable Housing and Sustainable Communities program**

SANDAG should supplement the Key Early Actions list for the TOD Strategy to include identification of a point person for the Affordable Housing and Sustainable Communities program.

[Recent press coverage from the Voice of San Diego](#) noted that the San Diego region received relatively few dollars from California’s Affordable Housing and Sustainable Communities program, an element of the state’s cap-and-trade funding. While the state program could possibly be updated to favor San Diego, SANDAG can also help projects be competitive.

SANDAG can help address this issue by identifying a point-person that members of the public, project sponsors, and developers of affordable homes can contact if they seek support and technical assistance with making applications to the Affordable Housing and Sustainable Communities program. SANDAG should also include the availability of this point person in their annual work plan, so that adequate staff resources are made available. This will help ensure that San Diego receives its fair share of the state’s program funds.

Adequate support from SANDAG is crucial to the success of applications from the San Diego area. Affordable Housing and Sustainable Communities applications [require participation and review by the region’s Metropolitan Planning Organization](#), and if SANDAG does not provide adequate staffing and information about those resources, then the San Diego region will continue to lose out on its fair share of funding.

**5. The TOD Strategy should include more funding for Smart Growth Incentive funds, and a commitment for a study on how to include affordable homes on the land owned by MTS and NCTD.**

Missing in the list of Key Early Actions is the expansion of SANDAG's existing Smart Growth incentives Program. Also missing is funding to help the two local transit agencies, MTS and NCTD to study how to make their lands more easily available for development as affordable homes. [As has been recently reported in the press](#), current policy by the transit agencies result in zero preference for affordable homes, jeopardizing the success of ridership growth and the transit agencies themselves.

These two options would make available more resources for cities to meet their various and diverse smart growth goals, and to help cities achieve the affordable housing goals in their housing elements.

**6. The process for adopting a TOD Strategy was flawed, and it should be a lesson for SANDAG moving forward.**

While Circulate San Diego does appreciate the commitment by SANDAG to undertake some Key Early Actions, it is important for the SANDAG board to recognize that these "Key Early Actions" do not commit SANDAG to actually changing or implementing policy.

In 2011, SANDAG committed to implement a TOD policy, as a part of the adoption of the 2011 Regional Transportation Plan. Four years later, SANDAG is poised to adopt a document that does not, by its own terms, change or update any element of SANDAG's policy. It commits only to examine policy changes, pushing the ultimate resolution of a meaningful policy back yet another year.

At best, SANDAG will have spent five years, and [\\$444,809](#) of the public's funds, adopting a policy. At worst, in the coming year SANDAG may choose to change no policies, and that \$444,809 will have been wasted entirely.

This process for adopting a TOD Strategy undermines SANDAG's credibility and resulted in a policy document that brings into question SANDAG's commitment to advancing TOD in a meaningful way.

**7. SANDAG's TOD Strategy can still be improved.**

Despite our dissatisfaction with the TOD Strategy, Circulate San Diego would be willing to support the document, as written, if it were paired with a good faith commitment from SANDAG to do two things:

- (1) Identify a point-person and staffing resources to help applicants with the Affordable Housing and Sustainable Communities program, and
- (2) Fund a study for how MTS and NCTD could make land available for affordable homes.

These commitments would help advocates and the public believe that SANDAG were truly committed to making meaningful policy changes in the course of the next year when it seeks to implement the Strategy's "Key Early Actions."

## 8. Conclusion

We look forward to continuing to work with SANDAG to implement the Key Early Actions identified in the Draft TOD Strategy. Circulate San Diego is committed to the success of sustainable growth for the San Diego region.

Sincerely,

A handwritten signature in blue ink that reads "Colin Parent". The signature is written in a cursive, flowing style.

Colin Parent  
Policy Counsel, Circulate San Diego