



**ATTACHMENT B**

**ONE-MILE WALKING PATH METHODOLOGY MEMORANDUM**  
**DATED JUNE 12, 2026**

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## MEMORANDUM

To: Text Amendment (TA) 26-0001 File  
From: Joseph Farace, Planning Director  
Date: June 12, 2026  
Subject: One-Mile Walking Path Methodology

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### **Purpose**

Government Code Section 65912.160(e)(1) authorizes a local government to designate areas within one-half mile of a transit-oriented development stop as exempt from the provisions of Chapter 4.1.5 of the Government Code, when the local government makes findings, supported by substantial evidence, that no walking path of less than one mile exists between the subject area and the transit-oriented development stop.

This memorandum describes the methodology used to identify areas where no walking path of less than one mile exists between certain areas within transit-oriented zones and the applicable transit-oriented development stop. Pursuant to Government Code Section 65912.160(e)(1), this memorandum also provides substantial evidence supporting the designation of those areas as exempt.

### **Methodology**

#### Data Used

The City conducted a network analysis utilizing Geographic Information System (GIS) feature layer data obtained from the San Diego Geographic Information Source (SanGIS). The GIS data used in the analysis included, but was not limited to, the following:

- TRAN\_TRANSITSTOP (transit stop locations)
- LR\_PARCEL (parcel boundaries)
- TRAN\_ROAD

These layers were used to identify publicly accessible facilities and evaluate pedestrian connectivity between transit-oriented development stops and surrounding properties within the transit-oriented development zones

#### Analysis

Walking path distances were measured using the ArcGIS Network Analyst extension that identified the shortest legal and publicly accessible pedestrian route between each transit-oriented development stop and surrounding parcels located within the applicable transit-oriented development zone.

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Distances were measured along the pedestrian accessible circulation network, using the available data indicated above.

For each transit-oriented development stop, the point of origin for each path was established using the centerline of the pedestrian-accessible route adjacent to the transit stop location identified by the San Diego Association of Governments (SANDAG). At the time of the analysis, SANDAG had not yet published a map of transit-oriented development stops and zones pursuant to Government Code Section 65912.160(f). The analysis then calculated the shortest available pedestrian route from the transit stop to the nearest point along each parcel boundary within the transit-oriented development zone.

The analysis excluded routes that:

- Cross private property without legal public access;
- Require pedestrians to traverse freeways, rail corridors, waterways, or other barriers without a designated pedestrian crossing;
- Utilize facilities that are not legally accessible to the public; or
- Require travel through unsafe or prohibited pedestrian areas.

Parcels for which the shortest available legal pedestrian route exceeded one mile were identified as exempt, pursuant to Government Code Section 65912.160(e)(1).

As a validation step, GIS staff also performed the analysis using a road network dataset obtained from the County of San Diego. The results were identical to those generated using the City's TRAN\_ROAD layer, confirming the accuracy and consistency of the methodology.

City staff also reviewed the validated results to confirm the existence of physical barriers and validate the calculated walking routes and distances. Any errors in the network analysis that did not conform to the exclusions identified above were manually corrected when the results were validated on June 12, 2026.

Supporting evidence includes GIS network analysis maps, aerial imagery, pedestrian circulation maps, distance calculations, and photographs documenting physical barriers and pedestrian facilities.