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October 9, 2018

Chair Georgette Gómez
Smart Growth and Land Use Committee
City Administration Building
202 "C" Street, 10th Floor
San Diego, CA 92101

Subject: Reforming San Diego's Parking Code

Dear Chair Georgette Gómez:

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to share proposed amendments to the City of San Diego's parking code drafted by Circulate San Diego.

In 2017 we published a report, "Transit Oriented Development"¹ with a number of recommendations for how the City of San Diego can advance its climate, affordability, and economic growth goals. In the report, we recommend that parking minimums be reduced in Transit Priority Areas. We also recommend eliminating parking minimums in Downtown San Diego. We were pleased to see that Mayor Faulconer's Housing SD plan proposes someday revising parking standards within TPAs, however that plan does not address reform of parking rules downtown.

City staff and consultants have been working on a parking study, which they wish to complete before proposing any reforms to the parking code. This has resulted in an unnecessary delay and no release yet of any proposed parking code amendments. Moreover, if the City felt like they needed a study to examine best practices from other regions, Circulate's own report certainly qualifies.

The amendments that are needed to fulfill the City's goals are not complicated and should be brought forward immediately. If the Mayor's administration is not able to take action to draft these amendments, they should be moved forward by action of the City Council.

¹ Circulate San Diego, Transit Oriented Development (January 9, 2017), available at <http://www.circulatesd.org/todreport>.

For these reasons, Circulate drafted parking code amendments that meet our shared goals. We urge the City Council to bring these code amendments forward expediently, without any further delay.

We would be happy to work with Council or Administration staff to refine or adjust the draft code language that we are sharing today.

Sincerely,

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

Colin Parent
Executive Director and General Counsel

Attachment A: [Parking Code Amendments](#)

Attachment A: Parking Code Amendments

Section 142.0561 Parking Minimum Requirements

Developments meeting the requirements of (a) below may elect to use the requirements of parking space minimums listed here for any component of the *development*, notwithstanding any other section of the code. Where another code section provides lower parking requirements for any element of a project that meets the requirements in this code, the lower parking requirement can be used for the relevant component of the *development*.

- (a) Minimum Required Parking Spaces Within *Transit Priority Areas*. The required automobile parking spaces, motorcycle parking spaces, and bicycle parking spaces for *developments* within *Transit Priority Areas* shall meet the criteria in Section 142.0561(a) as follows:
 - (1) Residential *Developments*.
 - (A) Residential *developments* in *Transit Priority Areas* require no more than 0.75 parking spaces per *bedroom*.
 - (2) Non-Residential *Developments*.
 - (A) Non-residential *developments* within *Transit Priority Areas* are required to build no more than 75 percent of the amount of parking otherwise required by the City's requirements for that *development* type.
 - (B) Permits, such as Site Development Permits and Transportation Demand Management (TDM) plans cannot be required to increase the parking minimum above what is required according to this section.
 - (3) Tandem Parking.
 - (A) Tandem parking shall be limited to a maximum of two cars in depth and should be 9 feet wide and 36 feet long.
 - (B) All residential *developments* within a *Transit Priority Area* shall allow tandem parking and count tandem spaces as two parking spaces, without exceptions.
 - (4) *Shared Parking*.
 - (A) All *shared parking* facilities shall be located within

a 2400-foot horizontal distance of the *development* and the shared parking facility when either is located within a *Transit Priority Area*.

- (B) *Shared parking* regulations are described in Section 142.0545.
- (5) *Mixed-Use Developments*.
 - (A) The residential portion of the mixed-use *development* requires no more than 0.75 parking spaces per *bedroom*.
 - (B) Non-residential portions of a mixed-used *development* shall be required to build no more than 75 percent of what it would otherwise be required to build.
- (6) *Parking Impact Overlay Zone*.
 - (A) Any residential or commercial *development* within a *Transit Priority Area* or a college impact areas of the Parking Impact Overlay Zone is not subject to Section 142.0520, Section 142.0525, Section 142.0530 or Section 132.0801 of the City of San Diego Municipal Code.
- (7) *Parking Substitutions*. Both residential and non-residential *developments* that meet the requirements of this section may satisfy some of their parking requirements with the below alternatives. Existing parking may be converted to take advantage of this provision. However, no more than 50 percent of a project's parking requirements can be satisfied with these substitutions. The 50 percent limit applies cumulatively to all exceptions in this subsection.
 - (A) *Bicycle Storage*.
 - (i) For every 3 bicycle parking spaces that exceed the short or long-term bicycle parking standards, the motor vehicle parking requirement is reduced by 1 parking space.
 - (B) *Motorcycle Storage*.
 - (i) For every 2 motorcycle parking spaces that exceed that motorcycle parking standards, the motor vehicle parking requirement is reduced by 1 parking space.
 - (C) *Car Sharing*.
 - (i) For every 1 car share parking space

- provided, the motor vehicle parking requirement is reduced by 3 parking spaces.
- (D) Electric Vehicle (EV) Parking.
- (i) For every car parking space designated for Electric Vehicles accompanied with charging stations that exceeds the required amount, the motor vehicle parking requirement is reduced by 2 parking spaces.
- (E) *Bike Share Station.*
- (i) For every *bike sharing station* providing 12 docks and 6 shared bicycles, the motor vehicle parking requirement is reduced by 3 spaces, or, in the alternative, if there is a minimum of 8 shared bicycles with no sharing station, the motor vehicle parking requirement is reduced by 2 spaces.
- (ii) The sharing facility must be adjacent to and visible from the street and must be publicly accessible.
- (iii) The sharing facility must be shown on the building plans.
- (F) Transit Passes.
- (i) For a guarantee of 10 years of monthly transit passes for two residents or employees, the motor vehicle parking requirement is reduced by 1 space.
- (G) In Lieu Fee. An in-lieu fee is allowed in exchange for 1 parking space; the funds from this can be used by the City or a parking district to build off-site parking or infrastructure to reduce nearby parking demand. The pricing for in-lieu fees is as follows:
- (i) \$18,000.
- Residential at less than 35 *dwelling units* per acre.
- Commercial at less than 3.0 *Floor Area Ratio (FAR)*.
- (ii) \$25,500.
- Residential at 35 *dwelling units* per acre.

Commercial at 3.0 *Floor Area Ratio (FAR)*
or more.

- (b) Centre City Planned District Parking Minimums. Within the Centre City Planned District, there shall be no minimum required number of parking or loading spaces to be provided and maintained for any principal or conditional use. Existing parking or loading spaces serving the Centre City Planned District that was required at the time the property was originally entitled may be reduced without providing equivalent substitute facilities.
- (c) Centre City Planned District Parking Minimums (Alternative). Within the Centre City Planned District, there shall be no minimum required number of parking spaces to be provided and maintained. If any parking is provided, accessible parking, guest/service parking, and loading spaces must be provided as per below. Existing parking serving the Centre City Planned District that was required at the time the property was originally entitled may be reduced without providing equivalent substitute facilities.
 - (1) Accessible Parking.
 - (A) Accessible Parking is defined as disabled persons parking zones or blue zones (blue painted curbs).
 - (B) Accessible parking is required for all new parking lots and in existing lots when alterations, structural repairs, or additions are made. Accessible parking spaces are required to be on the shortest accessible route of travel from parking to the building entrance(s).
 - (C) Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.
 - (i) Requirements for accessible parking are covered under the California Code of Regulations (Title 24) of the California Building Standards Code Chapter 11A: 1109A.3, 11B-208.2.3.3, and Table 11B-208.2 for Accessible Parking Standards.
 - (D) The minimum size of an accessible parking space shall be 9' wide by 18' in length.
 - (E) A 5' wide marked "No Parking" loading area shall

be provided adjacent to all accessible parking spaces. An adjacent space may share a loading area.

- (2) Visitor Parking.
 - (A) Visitor parking is subject to Section 156.0313(a)(1) of the City of San Diego Municipal Code.
- (3) Loading Spaces.
 - (A) Loading spaces are subject to Section 156.0313(a)(2) and Section 156.0313(b)(2) of the City of San Diego Municipal Code.