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October 15, 2019

Chairwoman Dayna Bochco  
Vice-Chair Steve Padilla  
California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

**RE: City of San Diego Major Amendment LCP-6-SAN-19-0063-1 (Transit Priority Area)**

Chairwoman Bochco, Vice-Chair Padilla, and Members of the Commission:

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 City of San Diego's parking regulations for multi-family development in Transit Priority Areas (TPAs) in the [Coastal Zone](#). Coastal access is imperative for all Californians, and this policy will provide more coastal access by allowing more homes near the coast, and more opportunities to access the coast by those who do not drive or own cars.

The City of San Diego's policy requires that new developments provide transportation amenities for residents who do not own a car. Those amenities create opportunities for new residents, and others to access the coast without having to rely on a car. For example, a developer-funded bus shelter is a benefit for residents of a new development near the coast, and for others who would use the same bus line to access the coast. Car ownership is lower among lower income people, so providing non-car means to access the coast is an important concern for transportation equity. Forcing car-focused infrastructure like mandatory parking further walls off coastal access to only those Californians who can afford or who have access to a car.

The ability to live near California's coast is currently limited to those who can afford some of the highest housing prices in the state, and to those who can afford to own cars. While rental apartments are more affordable, limited supply and the area's high desirability make multifamily housing still out of reach for many Californians, who are pushed farther and farther inland in search of affordability. The resulting sprawl is counter to California's, and San Diego's, greenhouse gas (GHG) reduction goals and runs counter to the Coastal Commission's principle of increasing coastal access for all Californians.

Allowing future multifamily development to be built without on-site parking, within TPAs and alongside developer-funded transportation amenities, is an effective means to increase coastal access. Homes without parking will be more affordable than equivalent new construction homes with required parking on-site. Homes without parking provide options for those who do not have a car to rent a home that meets their needs near the coast. It allows those without a car, or who want to get rid of their car, to not have to pay for an unused parking space that is included as part of their rent.

Those who live in homes without required parking in the Coastal Zone will then visit the coast by foot, bicycle, or transit instead of by car. Additionally, the transportation amenities required by the City of San Diego will allow more people who live away from the coast to be able to access those resources by bicycle, transit, and more. Allowing more people who do not own a car to live near the coast, and therefore access the coast without a car, frees up parking near the coast for those who have to drive.

We strongly urge the Coastal Commission to approve the City of San Diego's ordinance as adopted and without amendment in the Coastal Zone.

Sincerely,



Maya Rosas  
Director of Policy