



October 12, 2021

MTS Board
 1255 Imperial Avenue
 Suite 1000
 San Diego, CA 92101

SUBJECT: Update to Parking Policy for Joint-Development of MTS Properties

Dear MTS Board:

On behalf of the below coalition partners, we are writing with recommendations that MTS update its parking policies for joint-development of the agency’s properties.

In 2018, Circulate San Diego and its coalition partners led the research and advocacy for MTS to update its Joint-Development Policy 18 to transform empty parking lots into affordable homes.¹ Surveys of MTS riders show that parking availability is among the least important issues to transit riders.² While the updated Policy 18 is a major improvement, more clarity and predictability can be provided for how much parking should be maintained. This letter makes recommendations for MTS to explore a clarified policy.

1. Existing Projects Should Be Allowed to Proceed as Designed.

San Diego’s housing crisis is dire. Every delay to new homes, particularly affordable homes, perpetuates this crisis. Any project that is substantially along in the process (including any project that already has an exclusive negotiating agreement), should proceed without any design modifications based on a

¹ Colin Parent, Real Opportunity, Circulate San Diego (April 25, 2018), available at <https://www.circulatesd.org/realopportunity>.
² San Diego Metropolitan Transit System, Transit Optimization Plan Presentation, December 8, 2016, page 301, available at https://www.sdmts.com/sites/default/files/2016-12-08_board.pdf.

perceived lack of sufficient transit parking.

2. MTS Should Adjust its Joint-Development Policy to Clarify Parking Requirements.

Uncertainty over how much parking is required discourages development, may lead to developers overbuilding parking, and can result in delays when a project does not meet the unspoken expectations of the board or staff of MTS. In order to give certainty, and to promote transit use, the following guidelines should be established:

a. A baseline parking maximum should be established.

MTS should establish a baseline that no development on MTS property should require more customer parking than is currently being utilized. MTS can easily establish the baseline of existing demand by counting the number of spaces being utilized during peak commute times. With this policy, any redevelopment should not be required to provide or maintain more parking than the existing demand.

b. Discounts for customer parking should be available for characteristics of the site.

A development should receive a discount for how much customer parking to maintain, depending on characteristics that are likely to lead to lower parking demand. Those characteristics would be elements of the station location. This is similar to policies at BART, that recognize a lower parking requirement for projects in more urban contexts.³ Site characteristic discounts could include:

- Proximity to high density homes
- Proximity to jobs or other attractive destinations
- Connections to existing feeder bus routes
- Connections to high quality bicycle facilities
- Existing pick-up-and-drop-off facilities at the transit station

c. Discounts for customer parking should be available for characteristics of the proposed project.

In addition to providing discounts for parking on the basis of the development site, additional cumulative discounts should be available depending on the elements of the proposed project. These discounts could be structured to encourage developers to incorporate these elements into their project, to encourage the users of their developments to rely on transit. This is similar to the menu-of-options for transportation amenities allowed by the City of San Diego's recent parking reforms.⁴ Project characteristic discounts could include:

- Affordability mix of the project
- Providing transit passes to residents or workers
- Funding bicycle, pedestrian, or transit amenities at or adjacent to the site
- Funding new feeder systems, like higher quality bus service
- Funding for transportation education and encouragement programming
- Building bicycle storage

³ BART, Transit Oriented Development Guidelines (May 2017), pages 15-16, available at https://www.bart.gov/sites/default/files/docs/BART_TODGuidelinesFinal2017_compressed.pdf.

⁴ City of San Diego, Land Development Manual Appendix Q, March 25, 2019, available at https://www.sandiego.gov/sites/default/files/ldm_appendix_q_03092020.pdf, last visited September 12, 2021.

3. MTS Should Sponsor Safe Routes to Transit Planning Around Its Stations.

Nationally, over two thirds of transit users walk to their stop or station, and only 11% drive.⁵ While MTS may accommodate its users who drive to transit, the majority of its users do not benefit from parking. In fact, riders can be deterred by parking because large stretches of asphalt feel hostile to pedestrians.

Potential transit riders may also be deterred by dangerous infrastructure in the surrounding area. A safe routes to transit planning effort would allow MTS to increase ridership by coordinating with SANDAG and local governments to create safe infrastructure for pedestrians, shared mobility users, and bicyclists. By investing in pedestrians and bicyclists, MTS stands to gain riders while also promoting the most environmentally friendly modes of transportation.

As a public agency, MTS is eligible to receive funding from the Caltrans Active Transportation Program, among other sources, to engage in planning around its stations. Those plans can be the basis of future infrastructure efforts by SANDAG and MTS's constituent jurisdictions.

Conclusion

In our experience, it is difficult to demine an optimal amount of transit customer parking to maximize ridership. Arguably, no customer parking is the optimal amount for parking at a transit station, since it can preclude more jobs or homes near transit. Still, we recognize that political considerations, site-specific issues, and settled expectations for existing riders may compel some customer parking to be maintained.

Implementing the recommendations in this letter will help ensure that any parking maintained as a part of joint-development efforts will not undermine the goals of MTS to increase ridership, build homes, and contribute to addressing climate change.

Sincerely,

Colin Parent
Executive Director and General Counsel
Circulate San Diego

Laura Nunn
Chief of Policy and Education
San Diego Housing Federation

Jerry Sanders
President & CEO
San Diego Chamber of Commerce

Molly Chase
Vice President of Policy
San Diego Housing Commission

Lori Holt Pfeillier
President & CEO
Building Industry Association of San Diego

Jimmy Silverwood
President and CEO
Affirmed Housing

John Seymour
Vice President of Acquisitions
National CORE

Sean Spear
President and CEO
Community Housing Works

⁵ Hugh M. Clark, *Who Rides Public Transit*, American Public Transportation Association (Jan. 2017), available at <https://www.apta.com/wp-content/uploads/Resources/resources/reportsandpublications/Documents/APTA-Who-Rides-Public-Transportation-2017.pdf>.

Andrew Malick
Founder and Principal
Malick Infill Development

James Schmid
Founder and CEO
Chelsea Investment Corporation

Ginger Hitzke
President
Hitzke Development Corporation