PARKING
How the City of San Diego’s Parking Rules are Barriers to Transit Oriented Development

A #PlanDiego Report
Acknowledgements

**Lead Author: Andy Furillo**  
*Researcher, Circulate San Diego*

Andy Furillo is a researcher with Circulate San Diego. He conducts research and writes reports on numerous aspects of San Diego’s land use regulations that impact the city’s transportation network.

Andy previously interned at California Governor Jerry Brown’s Office in Sacramento and the U.S. Government Accountability Office in Washington, D.C. He received his B.A. from UC Berkeley and is a Master’s candidate at UC San Diego’s School of Global Policy and Strategy, where he is taking courses in international economics and statistical analysis. As part of his undergraduate studies, Andy completed a study abroad semester in Seoul, South Korea, where he experienced first-hand how a truly multi-modal transportation system can enhance quality of life in a city. He has taken an active interest in improving transit, bicycle, and pedestrian infrastructure in the U.S. ever since.

**Editor and Co-Author: Colin Parent**  
*Policy Counsel, Circulate San Diego*

Colin Parent is Policy Counsel at Circulate San Diego. His focus is affordable transit, safe walkable neighborhoods, and effective land use policy. Colin served on the Jerry Brown for Governor 2010 campaign, and was appointed by Governor Brown as the Director of External Affairs for the California Department of Housing and Community Development. Prior to working for Governor Brown, Colin practiced law for three years as a commercial litigator at DLA Piper US LLP. During 2013-2014, Colin served as the Director of Policy at the San Diego Housing Commission.

**Special Thanks**

Thanks also go to Circulate San Diego staff Jim Stone, Kathleen Ferrier, and Joe Cosgrove, as well as Chandra Slaven for editing support. Thanks to Circulate San Diego staff Oscar Medina and Brian Gaze for graphic design.
### Executive Summary

The parking rules in the City of San Diego are generally collected in the Municipal Code, not in individual community plan documents. This presents an opportunity for parking policy to become streamlined, and comprehensive in its approach. However, current parking rules in San Diego lacks cohesion.

Parking policy in San Diego is complex, inconsistent and difficult for developers to navigate. The parking code represents a hodgepodge of different policies, layered on top of one another over time, reflecting a variety of sometimes conflicting and shifting policy goals. In some circumstances, parking minimums for new developments are reduced because of lower expected or demonstrated demand. More frequently, parking minimums are increased, on the assumption that certain areas need added parking, or perhaps more cynically, to keep new developments from coming to those neighborhoods at all.

“For almost every new home constructed in San Diego, at least one new parking space is required to be built.”

For almost every new home constructed in San Diego, at least one new parking space is required to be built. This is true for even studio apartments and other homes well served by transit. San Diego’s parking rules assume every resident will drive for all of their trips. These rules are inconsistent with reality, where many San Diegans do not own a car, or would like to live without having to own a car and pay rent for car storage in the form of a reserved parking spot.

Parking minimums for new developments are generally intended to reduce the impact of a new building to the neighborhood, by limiting the number of new neighbors that use limited street parking. However, parking requirements for new developments have a variety of unintended consequences, famously identified as the “High Cost of Free Parking,” by Professor Donald Shoup, including the tendency to encourage traffic and drive up development costs and rents for end users.

While parking minimums may serve important purposes in some circumstances, parking minimums that are too high can hurt neighborhoods and limit the ability to achieve smart growth goals. The City of San Diego should examine parking reforms that will allow the City to meet its Climate Action Plan goals, and implement the General Plan’s City of Villages Strategy.
Introduction

Circulate San Diego recently launched our #PlanDiego initiative, dedicated to research and advocacy for sustainable land use policy in the region.

In the coming months, we will release a series of short reports identifying major barriers to transit-oriented development in the City of San Diego. These reports will be followed by a more comprehensive document identifying specific solutions the City should adopt to make transit oriented development more economical, affordable, and environmentally sustainable.

While updating community planning documents is a necessary component of implementing smart growth near transit, our recommendations will focus on improvements to city-wide policies in the Municipal Code. These policies can be updated separately from the long, expensive, and politically fraught process of updating community plans.

Burdensome development policies and housing shortages have become common in large American cities. However, San Diego land use policy uniquely undermines the goals of smart growth. A recent study by UC Berkeley School of Law found that San Diego land use around transit was the least well utilized compared to any other region in the state. A full 40 percent of housing costs in San Diego is the result of regulatory choices, not merely the high demand for the region’s good weather and proximity to the ocean.

These are not new problems for San Diego. While the cost of housing is often substantially higher than the cost of building in American cities today, San Diego is one of only three regions in the nation where this has been a problem since as early as the 1970s.

Blame for problems with land use policy in San Diego should not be laid on the current Mayor’s administration, or the current City Council. Land use policy is the result of thousands of administrative and legislative decisions, made over decades.

Nonetheless, improvements to land use policy can and should be the responsibility of current decisionmakers. By identifying some of the barriers to sustainable growth and transit-oriented development, Circulate San Diego’s goal is that current leadership in the City will take the necessary steps to modernize the City’s land use policies that inhibit smart growth.

This report begins our exploration of barriers to transit oriented development by examining San Diego’s current parking regulations.

Overview of San Diego Parking Regulations

The City of San Diego requires that new residential and commercial developments provide a minimum number of off-street parking spaces. According to the City, the Municipal Code parking regulations were drafted to maintain a unified set of standards and promote a multi-modal transportation system that is “safe and efficient” and encourages alternatives to driving alone (§ 142.0501).

However, the City of San Diego’s Municipal Code reflects many inconsistencies with this goal, requiring a large number of off-street parking spots (including one per studio apartment unit and more than one per one-bedroom unit) even for homes well served by public transit. The code also sets high parking minimums for areas on and adjacent to college campuses, even though many college students do not use cars regularly. In addition to the alternatives in effect for transit-oriented and high-parking areas, exceptions to the baseline regulation also exist for affordable housing complexes due to a documented lower parking demand at these residences.

“In almost all cases, it appears that San Diego’s parking regulations were drafted under the assumption all residents will own their cars and always drive them to their destinations.”

In almost all cases, it appears that San Diego’s parking regulations were drafted under the assumption that all residents will own cars and always drive to their destinations. As the region invests in new transit projects and promotes alternative transportation methods, it is worth considering changes to the existing parking regulations.
Single-Dwelling Residences (§142.0520)

Individual single-family detached homes are required to have two off-street parking spaces, accessible by a driveway, which does not disrupt the sidewalk pattern (§142.0520).

However, the rules are far more complex, depending on a variety of circumstances. Two additional spaces are required for units that do not have a driveway 20 feet or longer; these spaces can be on the street, but only if they are directly abutting the property on a local surface street, as long as they are normally not occupied for other uses. Houses with high-occupancy permits (six or more residents aged 18 or older (§ 123.0502)), must maintain parking spots for all adult residents but one. In Campus Impact Areas (§ 132.0801) homes with more than five bedrooms must have one parking spot per bedroom, with new homes providing a minimum of two parking spaces to be in a garage. This rule is likely designed to reduce impacts from college fraternities and sororities, or other types of “micro-dorms” in single family neighborhoods. Homes for seniors citizens require just one parking spot, but only if they have no more than one bedroom.

Multi-Dwelling Residences (§142.0525)

Multiple-dwelling units are developments such as apartment and condominium complexes that have more than one residence on their lots. The baseline parking requirements for these developments are laid out in the parking code’s Table 142-05C (§ 142.0525). Mandated spots for new apartments and condominiums are as follows:

- Studio up to 400 square feet: 1.25 spots
- 1 bedroom or studio over 400 square feet: 1.5 spots
- 2 bedrooms: 2 spots
- 3 or more bedrooms: 2.25 spots

“In all cases, at least one or more parking spot per unit is required.”

In transit areas described below, 0.25 fewer parking spots per unit than the above ratios are required. However, projects in parking impact areas must build 0.25 additional spaces per home. Units with five or more bedrooms in campus impact areas require one spot for each bedroom. In all cases, at least one or more parking spot per unit is required. Spots reserved for bicycles and motorcycles are also mandated, though at a ratio of well under one per bedroom. No maximum limit on parking is set for residential developments.

Table 142-05C (§ 142.0525) on the adjacent page, indicates numerous exceptions to the baseline rule, including condominium conversions (which have lower requirements than regular condominium complexes), rooming houses and boarding accommodations, residential care facilities, transitional homes, and affordable homes (see the section below).

Mixed-Use Developments (§142.0525)

Some multi-unit residential complexes incorporate non-residential business, such as stores, restaurants, or bars, typically occupying the first floor (§ 142.0525). These developments help reduce auto use as residents can walk to access services and amenities, resulting in compact complexes than can be placed near transit stations to further ease residents’ commutes. However, instead of recognizing the reduced need for car transportation, these facilities are subjected to additional parking requirements, negating the benefits mixed-use development provides. For example, retail space necessitates an additional 2.5 parking spots per 1,000 square feet; eating and drinking establishments require an additional five spots per 1,000 square feet.

Commercial Developments§142.0530

In contrast to residences, parking requirements for commercial developments are set based on the type of development and square footage specified in Tables 142-05E, 142-05F, and 142-05G (§ 142.0530). Requirements vary based on which city district the commercial use is located within. Square footage parking requirements are often higher for eating and drinking establishments than for retail space, offices, and commercial services. Unlike residences, maximum parking limits are also set for commercial developments, though these limits are very high (as many as 25 spots per 1,000 square feet in some cases). Since commercial development parking requirements are set by district, the Parking Impact Overlay Zones described on page seven are not applicable. But parking minimums are lower if the development is in a designated transit area, described on pages seven and eight.

These requirements can make it more expensive for entrepreneurs to open new establishments, such as craft beer tasting rooms, in dense areas that are easily accessible via public transit and other alternative methods. For example, a 4,000 square foot tasting room (a typical size for popular establishments in the San Diego area) in La Jolla would necessitate 20 parking spots. Project applicants can apply to lower or raise mandated
### Table 142-05C, §142.0525

**Table 142-05C**

Minimum Required Parking Spaces for Multiple Dwelling Units and Related Accessory Uses

<table>
<thead>
<tr>
<th>Multiple Dwelling Unit Type and Related and Accessory Uses</th>
<th>Automobile Spaces Required Per Dwelling Unit (Unless Otherwise Indicated)</th>
<th>Motorcycle Spaces Required Per Dwelling Unit</th>
<th>Bicycle(5) Spaces Required Per Dwelling Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Basic (1)</td>
<td>Transit Area(2)</td>
<td>Parking Impact(4)</td>
</tr>
<tr>
<td>Studio up to 400 square feet</td>
<td>1.25</td>
<td>1.0</td>
<td>1.5</td>
</tr>
<tr>
<td>1 bedroom or studio over 400 square feet</td>
<td>1.5</td>
<td>1.25</td>
<td>1.75</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>2.0</td>
<td>1.75</td>
<td>2.25</td>
</tr>
<tr>
<td>3-4 bedrooms</td>
<td>2.25</td>
<td>2.0</td>
<td>2.5</td>
</tr>
<tr>
<td>5+ bedrooms</td>
<td>2.25</td>
<td>2.0</td>
<td>(See footnote 6)</td>
</tr>
<tr>
<td>Reduced Parking Demand Housing (see Section 142.0527)</td>
<td>N/A</td>
<td>N/A</td>
<td>0.25 beyond that required in Section 142.0527</td>
</tr>
<tr>
<td>Condominium conversion(8)</td>
<td>1.0</td>
<td>0.75</td>
<td>1.25</td>
</tr>
<tr>
<td>1 bedroom or studio over 400 Square feet</td>
<td>1.25</td>
<td>1.0</td>
<td>1.5</td>
</tr>
<tr>
<td>2 bedrooms</td>
<td>1.5</td>
<td>1.25</td>
<td>1.75</td>
</tr>
<tr>
<td>Rooming house</td>
<td>1.0 per tenant</td>
<td>0.75 per tenant</td>
<td>1.0 per tenant</td>
</tr>
<tr>
<td>Boarder &amp; Lodger Accommodations</td>
<td>1.0 per two boarders or lodgers</td>
<td>1.0 per two boarders or lodgers</td>
<td>1.0 per two boarders or lodgers, except 1.0 per boarder or lodger in beach impact area</td>
</tr>
<tr>
<td>Residential care facility (6 or fewer persons)</td>
<td>1 per 3 beds or per permit</td>
<td>1 per 4 beds or per permit</td>
<td>1 per 3 beds or per permit</td>
</tr>
</tbody>
</table>
Exceptions to the Baseline Regulations

Parking Impact Overlay Zones (§ 132.0801)

Parking Impact Overlay Zones are areas where, due to anticipated high parking demand, minimum parking requirements for residential developments are set higher than the baseline (see § 142.0525, Table 142-05C for exact figures). These zones consist of areas near beaches (beach impact areas), including much of La Jolla and Pacific Beach, and neighborhoods surrounding college campuses (campus impact areas), as shown in Table 132-08A (§132.0802). For multi-unit dwellings, minimums are 0.25 spots per unit higher than the baseline in most cases. Single-unit dwellings of more than five bedrooms in campus impact areas are required to have one parking spot per bedroom.

In San Diego, campus areas also have relatively high access to non-car transportation modes. UC San Diego has two major transit centers (Gilman and VA Hospital) on campus, is served by two Bus Rapid Transit routes (SuperLoop Rapid 201/202 and Rapid 237), and will be served by the Mid-Coast Trolley Extension. The campus designated parking impact area also includes the UTC neighborhood, one of the most densely populated areas in the city. University of San Diego’s impact area is very close to the Old Town Transit Center (one of the city’s main transit hubs), the trolley’s Green Line, and the Coaster commuter rail line. San Diego State University has its own underground trolley station and is also the terminus of a Bus Rapid Transit route (Rapid 215). Because of the locations and associated densities, these specific areas should require less, not more parking for new developments.

Shared Parking Areas (§ 142.0545)

Businesses and residences within 600 feet of one another are allowed to use shared parking areas to meet their minimum parking requirements. Space minimums for these areas are set using a formula combining peak parking demand ratios for specific development types (§ 142.0545, Table 142-05I), and anticipated parking demand at different times of the day (§ 142.0545, Table 142-05J). Shared parking areas can include spaces for both commercial developments and residences.

“These requirements can make it more expensive for entrepreneurs to open new establishments, such as craft beer tasting rooms, in dense areas that are easily accessible via public transit and other alternative methods.”

Transit Areas (§§ 132.10 and 132.11)

San Diego’s Municipal Code designates two types of high-transit use areas with reduced parking requirements. The first, Transit Area Overlay Zones, are areas located close to public transportation (§ 132.1001). The second, Urban Village Overlay Zones, are areas planned as compact, mixed-use urban villages where residents can easily walk or use non-car transportation modes to access services (§ 132.1101).

Parking requirements are reduced below the baseline for these areas. However, one parking spot is required for even
studio apartments smaller than 400 square feet. Multi-family units are required to build 1.25 spots for each one bedroom, and 1.75 spaces per two-bedroom unit. In most cases, requirements are 0.25 spots below the baseline per multi-dwelling unit and 85 percent of the baseline for commercial developments. Some Transit Areas are also designated Parking Impact Areas; in these locations, the two designations offset and parking requirements revert to the baseline.

Table 132-10A shows locations that have been designated Transit Areas (§ 132.1002). These areas include central locations, such as Downtown, Old Town, and North Park, areas surrounding existing trolley stations, planned stops on the Mid-Coast Trolley Extension, and a corridor through Mission Bay, Pacific Beach, and La Jolla. The corridor through the beach communities is included despite only being served by standard MTS bus routes 8 and 30, while areas with more substantial transit service (such as UTC) were not designated transit areas.

**Affordable Homes (§ 142.0527)**

Units reserved for low-income residents, seniors, and disabled citizens paying no more than 35 percent of their income towards rent have been designated Reduced Parking Demand Housing. The reduced parking demand rules can apply for buildings that are entirely affordable, or for the subset of affordable homes in a mixed-income development. Parking requirements for these developments are much lower than the baseline (see § 142.0560, Table 142-05D) and vary based on the walkability of the neighborhood and access to transit (defined in § 142.0527(b)).

Walkability in the parking code is defined by the level and amount of services, such as retail, restaurants, schools, etc., available within a half-mile of the residence, and does not factor in the level of pedestrian and bicycle infrastructure (such as bike lane miles) in the area. Transit is defined by the number of peak-time per-hour trips for rail and Bus Rapid Transit routes stopping every 15 minutes within a half mile of the dwelling, and for standard bus routes stopping within a quarter mile of the dwelling.

These developments’ parking requirements are not further reduced when located in a Transit Area Overlay Zone. However, affordable developments’ parking requirements are much lower than for non-affordable projects in Transit Area Overlay Zones, even for areas that the affordable parking code considers to have a relatively low walkability or transit score. Developments located in Parking Impact Areas are still required to have 0.25 more parking spots per unit than the requirements for other affordable developments.

**Conclusion:**

The City of San Diego’s parking regulations assume that nearly all residents will own a car and use it as their primary form of transportation. New developments are required to include a significant amount of parking, even within areas with high levels of transit service and around college campus areas with a relatively diverse set of transportation options.

Large surface parking lots spread out development. Excessive parking requirements also make new developments less affordable and they limit the number of homes that can be constructed in priority areas, like near transit.

With auto use across America declining, it is worth examining alternatives to requiring excessive parking, while maintaining a reliable and efficient transportation system.

Circulate San Diego will soon issue a variety of recommendations on parking reform as a part of our continuing #PlanDiego effort to develop smart land use policy.

Moreover, the mode-share goals for the City of San Diego’s Climate Action Plan envision many more San Diegans commuting without a car. Parking rules that assume every resident will require personal car storage is inconsistent with the Climate Action Plan.
Endnotes

5. Fermanian Business & Economic Institute at Point Loma Nazarene University, Opening San Diego’s Door to Lower Housing Costs (2015), available at http://nebula.wsimg.com/de788b5616c255287f0d8d294150d113?AccessKeyId=83DD3BA8B6DSBOMBFB690&disposition=0&alloworigin=1.
6. David Schleicher, City Unplanning, 122 Yale L.J. 1670, 1692 (2013) (Note that the other two cities were also in California: San Francisco and Los Angeles), available at http://www.yalelawjournal.org/article/city-unplanning.
7. City of San Diego, Municipal Code Chapter 14, Article 2, Section 5, available at http://docs.sandiego.gov/municode/MuniCodeChapter14/Ch14Art02Division05.pdf. Hereinafter, references to the San Diego Municipal Code will be listed with in-line parenthetical references to the relevant code subsection.
8. View Diagram 132-08A to see the extent of Campus Impact Areas here http://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art02Division08.pdf.
12. Id.