



THE CITY OF SAN DIEGO
M E M O R A N D U M

DATE: May 12, 2021

TO: Claudia Brizuela, Associate Traffic Engineer, Mobility Department

FROM: Rebecca Malone, AICP, Senior Planner, Planning Department

SUBJECT: Environmental Support for the CEQA Exemption for Parking Policy Reform for Non-Residential Uses in Transit Priority Areas and Neighborhood Commercial Uses Citywide

In an effort to align the City's policies to better reflect its climate and long-range mobility goals, the City of San Diego Mobility Department initiated an amendment to reduce the City's minimum parking requirements for a majority of non-residential land uses within Transit Priority Areas (TPAs), as well as neighborhood serving commercial land uses citywide. This effort is complementary to many of the City's previous efforts, most immediately, the recently completed effort to reduce parking requirements for multi-family residential developments within TPAs, as well as the City's Climate Action Plan and Complete Communities-Mobility Choices Initiative. The Environmental Policy Section of the Planning Department conducted an environmental review and determined that the project meets the criteria set forth in CEQA Guidelines Section 15061(b)(3) (Common Sense Exemption), as the proposed Parking Requirement Regulatory Reform would not cause a significant effect on the environment. The Parking Requirement Regulatory Reform is directed at development that meets the requirements described in Senate Bill (SB) 743 and would, thus, support a reduction in Vehicle Miles Traveled (VMT).

SB 743, which was codified in Public Resources Code Section 21099, required changes to the CEQA Guidelines as it relates to analyzing transportation impacts. With the passage of SB 743, the focus of transportation impact analysis in CEQA documents has shifted from automobile delay to VMT. Accordingly, automobile delay is no longer considered a significant impact under CEQA. While lead agencies are still required to analyze potential transportation-related impacts on air quality, noise, safety, or any other secondary impact associated with transportation (PRC §21099(b)(1)), SB 743 includes several notable changes to CEQA applicable to transit-oriented developments and certain infill projects. In particular, Public Resources Code Section 21099(d)(1) states as follows:

“Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.”

The California Governor's Office of Planning and Research (OPR) released a revised *Technical Advisory* in April 2018, which provides technical recommendations for assessing VMT, thresholds of significance, and mitigation measures. Also included in the *Technical Advisory* are suggested screening thresholds for land use projects, which can be used to quickly determine whether a project would result in less than significant transportation impacts. For certain projects (i.e., residential, retail, office, and mixed-use projects) within a transit priority area, the *Technical Advisory* notes that a project could generate significant levels of VMT if it includes more parking for residents, customers, or employees than required by the jurisdiction (if the jurisdiction requires the project to

supply parking). On the other hand, the *Technical Advisory* indicates that projects that include the removal or relocation of off-street or on-street parking spaces would not likely lead to a substantial or measurable increase in vehicle travel. Similarly, the *Technical Advisory* indicates that projects that include the adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs) also would not likely lead to a substantial or measurable increase in VMT. These suggested screening thresholds reinforce the fact that reducing the availability of parking within transit priority areas correlates to a reduction in VMT, as intended by SB 743. As such, consistent with SB 743, reduced parking requirements per the proposed Parking Requirement Regulatory Reform would not result in a significant impact on the environment under CEQA.

The California Air Pollution Control Officers Association (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* report includes limiting parking supply as one of many VMT-reduction measures. The report recommends this measure for residential, retail, office, industrial and mixed-use projects within urban and suburban contexts. Non-residential uses in TPAs and neighborhood commercial uses would fall within the measure applicability guidelines set by CAPCOA. CAPCOA estimates that the elimination or reduction of minimum parking requirements would result in a 5-12% reduction in VMT. One source for this CAPCOA report is the Transit Cooperative Research Program (TCRP) Report 95, Chapter 18: Parking Management and Supply: *Traveler Response to Transportation System Changes*, which provides a discussion of multiple parking supply management strategies including reducing or removing parking minimums. This report includes a review of multiple cities in the United States and Canada, as well as a case study of the central business district in Portland, OR, to demonstrate the effect that limiting parking ratios has on parking demand and transit use. The TCRP report found that limiting parking supply reduces vehicular trips and increases transit use.

The proposed Parking Requirement Regulatory Reform would not change the plan densities for non-residential or neighborhood commercial development depicted within the general plan/community plans, nor would it change any zoning or allowable land use densities. No new development beyond the plan densities would result with the implementation of the Parking Requirement Regulatory Reform. However, the allowance for reduced parking minimums would facilitate construction of non-residential uses within TPAs and neighborhood commercial uses citywide to achieve planned maximum densities by reducing the space that parking occupies, while staying within the development envelope permitted by the zoning and adopted regulatory framework. As stated in Section 131.0502 of the San Diego Municipal Code, neighborhood serving commercial, or CN zones “allow development of a limited size with a pedestrian orientation”.

Because the City’s reduced parking requirements are directed at development that meets the requirements described in SB 743 or are neighborhood commercial uses within urban and suburban contexts and because additional non-residential and neighborhood commercial development facilitated by the Parking Requirement Regulatory Reform would be within the existing general plan/community plan designations and zoning, reduced parking requirements for non-residential projects that are located within a TPA and neighborhood serving commercial projects citywide would not result in a significant impact on the environment under CEQA.

Therefore, the proposed Parking Requirement Regulatory Reform for Non-Residential Uses in TPAs and Neighborhood Commercial Uses Citywide would be exempt from CEQA pursuant to CEQA Guidelines Section 15061(b)(3), which states that CEQA applies only to projects which have the potential for causing a significant effect on the environment.

Additionally, any additional development that may occur as the result of additional land being available for development in areas that would have otherwise been used for parking, would be consistent with the Final EIR for the Climate Action Plan (SCH No. 2015021053, certified by City Council Resolution R-310176 on December 15, 2015), and the Final EIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 201906003, certified by City Council Resolution No. R-313279 on November 9, 2020). Specifically, the project is consistent with

Page 3

Claudia Brizuela, Associate Engineer, Mobility Department
May 12, 2021

Climate Action Plan Strategy 3, which calls for strategic land use planning involving new development being located within TPAs, which increases the mode share for walking, bicycling, and transit, and development would be required to comply with Complete Communities: Mobility Choices, which requires the provision of active transportation VMT-reducing measures.



Rebecca Malone, AICP

Senior Planner

RM/rm

Attachments:

1. Notice of Exemption for the Parking Requirement Regulatory Reform

cc: Heidi Vonblum, Deputy Director, Planning Department
Alyssa Muto, Director, Mobility Department
Tanner French, Senior Traffic Engineer, Mobility Department