City of San Diego

Parking Policy Reform

Technical Memorandum

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1. Introduction

Several environmental and mobility studies, including the California Air Pollution Control Officers Association's (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures, 2010*, identify the reduction of on-site parking requirements as one method to reduce vehicle mile traveled (VMT) and greenhouse gas (GHG) emissions. Further, other studies, such as the San Diego Association of Governments' (SANDAG) *Parking Strategies for Smart Growth, 2010*, and Transit Cooperative Research Program's (TCRP) *Traveler Response to Transportation System Change, 2004*, have found that local jurisdictions largely over require on-site parking for developments, and contain similar recommendations for the reduction of on-site parking requirements. In addition, in 2005, renowned Professor of UCLA's Department of Urban Planning, Donald Shoup, highlights the need for parking reform in his book "The High Cost of Parking." Shoup explains how parking requirements impose a public subsidy for drivers and parking reform is necessary to reduce automobile dependency, travel demand and cost of urban development. Therefore, with this effort, the City of San Diego is evaluating the reduction of parking requirements for non-residential uses within Transit Priority Areas (TPAs), in hopes of addressing many of the City's and State's transportation goals. It should be noted that the City of San Diego eliminated on-site parking requirements for new multi-family residential developments within TPAs in 2019.

Non-residential land uses are the places where people shop, work, play, and gather. They include neighborhood shopping centers, office buildings, restaurants, and other places visited throughout daily activities. Research has shown that the availability of parking plays a key role in the type of trip that will be made. If parking is available, patrons are more likely make the trip in an automobile. Further, land uses near high frequency transit present opportunities for reducing the reliance on the automobile and taking advantage of transit that is available.

TPAs are defined as areas located within one-half mile of a major transit stop. A major transit stop is defined as a site containing an existing rail transit station, ferry terminal served by either a bus or rail transit service, or the intersection of two or more bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods[1].

Reducing parking requirements for non-residential uses in TPAs is complementary to the City of San Diego's landmark Climate Action Plan (CAP) 2015, the City's General Plan City of Villages Strategy, the City's Complete Communities initiative and the recently completed effort to reduce parking requirements for multi-family residential developments within TPAs. Both the CAP and the City of Villages Strategy share an overarching goal to expand the range of activities aimed at reducing the level of emissions released into our atmosphere, developing robust multimodal transportation networks and providing a diversity of land uses near transit.

City of San Diego Climate Action Plan

The City of San Diego's CAP includes five strategies to reduce GHG emissions to achieve the 2020 and 2035 targets: (1) Energy & Water Efficient Buildings, (2) Clean & Renewable Energy, (3) Bicycling, Walking, Transit & Land Use, (4) Zero Waste (Gas & Waste Management), (5) Climate Resiliency.

[1] Source: Pub. Resources Code, § 21099, subds. (a)(7), (b)(1) and Pub. Resources Code, § 21064.3

Strategy 3 reads in its entirety: "Bicycling, Walking, Transit & Land Use Transportation strategies cover a broad range of activities that aim to reduce vehicle miles travelled (VMTs), improve mobility, and enhance vehicle fuel efficiency. Specific implementation measures involve changing land uses, adopting a new perspective on community design, promoting alternative modes of travel, revising parking standards, and managing parking."

This effort sets Strategy 3 into motion for non-residential uses.

Complete Communities

The Complete Communities initiative focuses on four key areas: Housing Solutions, Mobility Choices, Play Everywhere (parks), and Infrastructure Now. The Mobility Choices focus area is most relevant to this program, since it aims to connect every San Diegan with safe and convenient mobility options that can reliably connect them to jobs, shopping, services, neighborhood parks, open spaces and other amenities. With more mobility choices, roads become less congested and everyone, regardless of their background and identity, will enjoy a cleaner San Diego. Specifically, the initiative created a mechanism which requires development to provide active transportation amenities where they are most needed.

Multi-Family Parking Requirements within TPAs

As previously mentioned, the City Council adopted an ordinance to update the City's Municipal Code and Land Development manual to eliminate parking requirements for multi-family residential developments in TPAs in January 2019. During the City Council meeting, it was apparent that the ordinance was supported by diverse interests, as advocates, urbanists, architects, and developers, spoke in favor of the project.

The multi-family residential program adopted zero parking minimums for developments within TPAs. The code update also required that developers of multi-family residential within TPAs, outside of downtown, include a series of Transportation Amenities. Transportation Amenities are features which reduce vehicle trips and inform, educate, and incentivize transit use, biking, walking, and ridesharing. Transportation Amenities could be a direct benefit to the development or have a community benefit as well. For the multi-family residential program, the type and quantity of required Transportation Amenities is based on a scoring system derived from the project's location and design.

The success of the multi-family residential parking reduction program encouraged the City of San Diego to address parking requirements for non-residential uses.

This effort will build on the foundation laid by the previous efforts by setting the following goals:

- Incentivize GHG and VMT reductions
- Capitalize on transit investments to provide equitable mobility options
- Reduce dependence on single occupancy vehicle trips
- Allow flexibility to accommodate emerging mobility options and future development
- Create communities as places to live and work
- Identify techniques to better capture the value and utilization of land

2. Peer City Review and Selection

In order to determine how parking reductions could influence the stated project goals listed above, research was conducted on other U.S. cities who have implemented similar strategies. The complete

analysis of the Peer City research can be found as **Attachment 1** to this report. **Table 1** outlines the initial peer cities which were investigated, as well as some of the key demographics and statistics that were utilized to determine their similarity and applicability to San Diego.

Table 1: Peer City Demographics

City	Population Size	Households	Jobs	Jobs per HH	Vehicles per HH
San Diego, CA	1,390,966	504,000	723,119	1.43	1.86
Atlanta, GA	465,230	200,000	253,859	1.27	1.48
Austin, TX	916,906	377,000	551,084	1.46	1.71
Boise, ID	220,859	88,900	115,521	1.30	1.84
Cleveland, OH	385,552	172,000	159,210	0.93	1.42
Columbus, OH	881,901	355,000	463,996	1.31	1.65
Costa Mesa, CA	112,930	40,600	63,205	1.56	1.94
Denver, CO	678,467	297,000	402,288	1.35	1.68
Los Angeles, CA	4,000,000	1,380,000	2,050,000	1.49	1.73
Newport Beach, CA	86,793	38,000	43,305	1.14	1.91
Minneapolis, MN	411,452	176,000	247,103	1.40	1.54
Oakland, CA	425,204	159,000	224,968	1.41	1.62
Phoenix, AZ	1,630,000	559,000	791,996	1.42	1.80
Portland, OR	630,331	266,000	365,134	1.37	1.65
Sacramento, CA	489,650	189,000	233,716	1.24	1.76
Salt Lake City, UT	194,188	76,900	106,439	1.38	1.71
Seattle, WA	688,245	330,000	435,541	1.32	1.54

Source: American Community Survey, Census

Peer cities were selected based on a combination of factors and similarities to the San Diego region including population size, jobs per household and the relevancy of parking reductions. The list in Table 1 was narrowed down to seven cities, which were carried forward for further examination. This included Seattle, Portland, Sacramento, Salt Lake City, Austin, Denver, and Minneapolis.

The final seven peer cities, and reason(s) as to why they were included, are listed below.

Seattle, WA: Seattle is a west coast city which has not required parking for commercial uses in the downtown since 1980. In 2004, Seattle eliminated required parking for non-residential uses in other parts of the City outside of downtown, primarily near frequent transit. This makes Seattle a leader in the parking reform arena and gives them decades of experience/data to draw upon. Seattle was chosen for this reason and as an inspirational example for the City of San Diego.

Portland, OR: Portland is another west coast city which has not required parking for commercial uses in the downtown since 1980. Portland also eliminated parking for non-residential uses in other parts of town starting in 2001, especially sites that were well served by transit. Like Seattle, this makes Portland a pioneer in the parking reform arena and gives them decades of experience/data to draw upon. Portland was chosen for this reason and, similarly to Seattle, as an inspirational example for the City of San Diego.

Sacramento, CA: Sacramento is a city in Northern California that has several years of not requiring off-street parking minimums for certain zone districts. Similar to the aforementioned cities, it gives Sacramento some historical data to draw upon. It also provides San Diego with an example within the state.

Salt Lake City, UT: Salt Lake City is in the midst of reforming their parking requirements. They have structured their parking reform around typologies (or zone districts). Since San Diego has recently explored categorizing parts of the City, in similar typologies, based on the vehicle miles traveled (VMT) efficiency, this made Salt Lake City a noteworthy peer city.

Denver, CO: Similar to Salt Lake City, Denver uses typologies to inform their parking requirements. This is something that the City of San Diego is currently exploring to incorporate into their non-residential parking requirements. This approach and experience made Denver an attractive peer city.

Austin, TX: Austin is in the process of adjusting parking requirements for their University Neighborhood Overlay Area. This neighborhood is the densest neighborhood in the Southwest United States. Austin also has a similar jobs-to-household ratio as the City of San Diego and was evaluated as a peer City in the multi-family parking requirements as well. This context made Austin an appealing peer city.

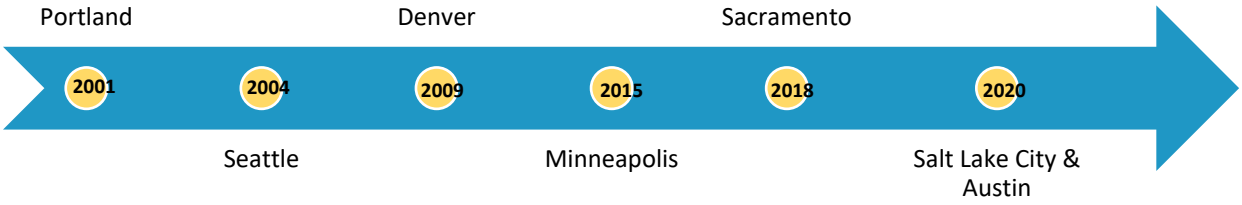
Minneapolis, MN: Over the last decade Minneapolis has been reforming parking standards. Additionally, like Austin, the jobs-to-household ratio in Minneapolis is similar to that of San Diego. Due to the City's earnest commitment to reducing parking and similarities to San Diego, Minneapolis was found to be an eye-catching peer city.

Table 2 provides a summary of the key demographics and statistics for the seven peer cities that were selected for further research.

Table 2: City of San Diego compared to Peer Cities

City	Total City Population	Population per Sq Miles	Jobs per household	Jobs per Square Miles	Bike Commuters	Walk Commuters	Transit Commuters	Carpool	Transit Ridership per capita	Vehicles per Household
San Diego, CA	1,390,966	4,277	1.43	2,224	1.0%	3.1%	4.0%	8.6%	0.08	1.86
Austin, TX	916,906	3,078	1.46	1,850	1.3%	2.3%	3.9%	9.5%	0.04	1.71
Minneapolis, MN	411,452	7,624	1.40	4,579	4.1%	7.0%	13.5%	7.9%	0.05	1.54
Portland, OR	630,331	4,724	1.37	2,737	6.5%	5.7%	12.3%	8.9%	0.14	1.65
Denver, CO	678,467	4,434	1.35	2,629	2.2%	4.4%	6.8%	8.1%	0.14	1.68
Sacramento, CA	489,650	5,000	1.24	2,387	2.0%	2.9%	3.7%	11.1%	0.03	1.76
Salt Lake City, UT	194,188	1,748	1.38	958	2.6%	5.4%	6.7%	11.4%	0.12	1.71
Seattle, WA	688,245	8,199	1.32	5,189	3.5%	10.2%	21.4%	7.6%	0.14	1.54

Figure 1: Timeline: of When Cities Eliminated Parking Requirements for Non-Residential Uses within Proximity of Transit Outside of Downtown



3. Peer City Parking History

After an evaluation of the seven originally selected cities, the comparison was then narrowed to four cities. The four cities: Seattle, Portland, Denver, and Minneapolis were chosen in part because their parking reforms have been in place for the longest length of time (See Figure 1). This allows for trends over time to be analyzed. Additionally, the parking reduction programs goals for these Example Cities were in-line with the City of San Diego's goals.

SEATTLE

	San Diego	Seattle
Population	1,390,966	688,245
Pop. per Sq Miles	4,277	8,199
Jobs per HH	1.43	1.32
Jobs per Sq. Mile	2,224	5,189
Bike Commuters	1.0%	3.5%
Walk Commuters	3.1%	10.2%
Transit Commuters	4.0%	21.4%
Carpool	8.6%	7.6%
Transit Ridership per Capita	0.08	0.14
Vehicles per Household	1.86	1.54

Table 3: Seattle: Demographics

The City of Seattle has a forty-year history of not requiring parking for select uses in certain parts of the city. In 1980, Seattle adopted zero minimum parking requirements for non-residential uses in downtown, the maximum was set at 1 space per 1,000 square feet[2]. In 2004 Seattle was growing and there was a conscious effort to invest in transit. To maximize the City's investment in transit, Seattle expanded the zero minimum parking requirements to all uses within Urban Centers and Light Rail Station Areas.

Urban Centers are areas governed by Washington State's Growth Management Act, they are the areas where growth is required to have targets. A Light Rail Station Area is currently defined as the area within one-half mile around a light rail station (which is similar to California's definition of TPAs). It should be noted, in the mid-90's Urban Centers were defined as areas within one-quarter mile of a transit station. This has since evolved to a larger one-half mile area surrounding a light rail station. The Light Rail Station Area is technically an overlay zone[3]. These areas are mapped in the Comprehensive Plan but are not defined in the code.

In 2006, the City of Seattle revamped parking requirements for commercial uses. Commercial uses were addressed independently at this time since the code needed to be overhauled to be more user friendly.

In 2010, the City wanted to further spur development, and therefore expanded the no minimum parking requirements to Urban Villages that had "Frequent Transit" service. Urban Villages are mixed use neighborhoods and are a designated area. Frequent transit service was not clearly defined in 2010, but essentially were areas with 15-minute headways during the week and 30-minute headways on the weekend and at night.

[2] Interview with Mary Catherine Snyder, Parking Strategist, City of Seattle Department of Transportation
[3] Gordon Clowers gave these definitions in an interview on October 30, 2018.

GOALS

The City of Seattle had three main goals when implementing their non-residential parking requirements:

1. Simplify the current code
2. Improve the code to achieve "better development outcomes in commercial zones"
3. Promote growth patterns consistent with comprehensive plan objectives

Subsumed in these goals was the desire to grow residential with ground floor commercial to meet some of the planning goals.

The City of Seattle feels that it has realized success on all three of its original goals. In addition to the parking reforms, Seattle noted that the city undertook a number of neighborhood-specific rezones over time, increasing density and allowing for more infill. Staff stated that these were important to get better development outcomes.

CURRENT POLICIES

Parking requirements are governed by Seattle's Land Use Code Title 23. Required parking and maximum parking limits can be found in Seattle's Land Use Code 23.54.015 and in table A for non-residential uses. Downtown is governed by Land Use Code 23.49.019. Reductions to required parking are outlined in 23.54.020(F) which include Transit reductions in subsection 2 as applied to areas with frequent transit service but not located in an Urban Center, Urban Village, or Station Area Overlay District. Seattle's current non-residential parking policies are summarized below in Table 4.

Table 4: Parking Requirements for Non-Residential Uses: Seattle

Policies	
Zero Required Parking for Non-Residential Uses	* Downtown (23.49.019) * Urban Centers (23.54.020 Table A, Section II(J)) * Urban Villages (23.54.020 Table A, Section II (K)) * Light Rail Transit Stations Areas
Parking Waivers (23.54.015(D))	* In all commercial zones and in pedestrian-designated zones, no parking is required for the first 1,500 sq. ft. of each business establishment or the first 15 fixed seats for motion picture/performing arts theaters * In all other zones, no parking is required for the first 2,500 sq. ft. of gross floor area of non-residential uses except for: • Buildings with drive-throughs • Motion picture theaters • Offices • Institutions
Reductions to Required Parking (23.54.020(F)(2))	* In multi-family and commercial zones, the minimum required parking for all uses is reduced by 50 percent if the property is located within a frequent transit service area, and the property is not located in an Urban Center, Urban Village, or Station Area Overlay District. * In industrial zones, the minimum parking requirement for a nonresidential use is reduced by 15 percent if the use is located within a frequent transit service area.

LIST OF LESSONS LEARNED FROM CONVERSATION WITH CITY OF SEATTLE STAFF

- The City of Seattle had three big-picture objectives in mind when adjusting parking requirements for commercial uses: simplify the code content, improve the code for better development outcomes, and promote growth patterns in urban centers and urban villages consistent with comprehensive plan objectives.
- Changes in the Land Use Code had to be made to align with growth related goals in the Comprehensive Plan.
- The code changes were championed by department leaders who were able to stay the course despite changes in political leadership.

PORTLAND

In the City of Portland, there have been many different factors that have influenced parking requirements over time. Historically, the City of Portland has had two zones – storefront and mixed-use – which from their inception have never required minimum parking[4].

The City carried forward this tradition in the *1980 Comprehensive Plan* which did not require parking for commercial uses in the downtown/central city as well as the "inner ring," defined as the inner streetcar era neighborhoods.

Additionally, the State of Oregon's Transportation Planning Rule influenced City policy.

In 1973, the Oregon State legislature enacted a statewide land use-planning program, founded on a set of 19 Statewide Planning Goals. The goals expressed the state's policies on land use and related topics.

Goal 12, the Transportation Goal, was adopted as part of the original group of statewide planning goals. Goal 12 seeks to 'provide safe, convenient and economic transportation system.' Amongst other things, Goal 12 states that a transportation plan should 'consider all modes of transportation including mass transit, air, water, pipeline, rail, highway, bicycle and pedestrian… be based upon an inventory of local, regional and state transportation needs… avoid principal reliance upon any one mode of transportation.'

	San Diego	Portland
Population	1,390,966	630,331
Pop. per Sq Miles	4,277	4,724
Jobs per HH	1.43	1.37
Jobs per Sq. Mile	2,224	2,737
Bike Commuters	1.0%	6.5%
Walk Commuters	3.1%	5.7%
Transit Commuters	4.0%	12.3%
Carpool	8.6%	8.9%
Transit Ridership per Capita	0.08	0.14
Vehicles per Household	1,86	1.65

Table 5: Portland: Demographics

In 1991, seventeen years after Goal 12 was adopted, the State adopted the Transportation Planning Rule "TPR" (OAR Chapter 660-012) to implement the Goal. The purpose of the TPR was to guide jurisdictions through meeting the broad objectives of Goal 12.

[4] Interview with Matt Wickstrom, City Planner, Bureau of Development Services, May 23, 2018

In 2001/2002 Metro, the Metropolitan Planning Organization (MPO) for the Portland area, updated their land uses policies which led the City of Portland to update its transportation system plan[5]. Oregon law requires cities and counties in the region to update their local transportation system plans to be consistent with Metro's Regional Transportation Plan.

As the metropolitan planning organization for the Portland metropolitan area, Metro is authorized by Congress and the State of Oregon to coordinate and plan investments in the transportation system for Clackamas, Multnomah and Washington counties. Portland is located in Multnomah County. This is done through periodic updates to the Regional Transportation Plan.

In 2001/2002, the City undertook more serious efforts to start reducing parking in commercial zones, in large part due to the changes at the State and at Metro. The City eliminated parking requirements in general commercial zones. Additionally, sites well served by transit were exempt from parking as long as there were 20-minute headways in the AM/PM peak periods. This applied to residential and commercial uses. Recently, the City has updated their code to have transit proximity apply to mixed-use developments as well.

GOALS

Initially, the City of Portland's main goal was to reduce single occupancy vehicle trips into and within the Downtown area. About two decades later they added the goal of trying to reduce Vehicle Miles Traveled (VMT).

Though not an original goal, one of the biggest benefits of reducing commercial parking requirements, according to City staff, was allowing for change in occupancy and the re-use of buildings.

CURRENT POLICIES

The City of Portland's Zoning Code, Chapter 33.266 Parking, Loading, And Transportation and Parking Demand Management governs required parking. Subsection 110 governs minimum required parking and subsection 115 governs maximum allowable parking spaces. Table 266-1 lays out parking requirements by zone, whereas Table 266-2 lays out parking requirements by use. Table 266-1 and Table 266-2 work together. **Table 6** outlines the non-residential parking policies within the City of Portland.

Table 6: Parking Requirements for Non-Residential Uses: Portland

Policies	
Zero Required Parking for Non-Residential Uses	* 1500 feet or less from a transit station, or 500 feet or less from a transit street with 20-minute peak period service * Sites that are 7,500 sq ft or less * Central Employment (Zone EX) * Central Residential (Zone RX) * Commercial Central (Zone CX)
Reductions to Minimum Required Parking	* Tree preservation * Bicycle parking * Transit supportive plaza * Motorcycle parking

[5] Interview with Matt Wickstrom, City Planner, Bureau of Development Services, May 23, 2018

* Car-Sharing
* Bike Share

^Table 266-2 has Standard A and Standard B columns, Table 266-1 notes that for most uses Standard A is the minimum and Standard B is the maximum.

LIST OF LESSONS LEARNED FROM CONVERSATION WITH CITY OF PORTLAND STAFF

- Historically, Portland had a lot of commercial uses that do not provide parking.
- The biggest benefit Portland saw of reducing commercial parking requirements was allowing for change in occupancy and re-use of buildings.
- City policies were really influenced by State policy and changes in policy by the MPO.

DENVER

	San Diego	Denver
Population	1,390,966	678,467
Pop. per Sq Miles	4,277	4,434
Jobs per HH	1.43	1.35
Jobs per Sq. Mile	2,224	2,629
Bike Commuters	1.0%	2.2%
Walk Commuters	3.1%	4.4%
Transit Commuters	4.0%	6.8%
Carpool	8.6%	8.1%
Transit Ridership per Capita	0.08	0.14
Vehicles per Household	1.86	1.68

Table 7: Denver: Demographics

The City of Denver underwent a comprehensive zoning code update in 2010.

Generally speaking, the City looked at the following 5 use context categories and tied parking requirements to those:

- Suburban Neighborhood Context
- Urban Edge Neighborhood Context
- Urban Neighborhood Context
- General Urban Neighborhood Context
- Downtown Neighborhood Context

Currently, the vast majority of Downtown does not require parking for either non-residential or residential uses, while some zone districts within Downtown have maximum allowable parking ratios. Before this change, parking was not counted towards the floor-area-ratio, now parking is not required but if it is included above ground it counts toward the floor-area-ratio. This is a significant change since including above-ground parking in a development, will limit leasable space.

An area of the City named River North, does not require any parking for either residential or non-residential uses if the site is within one-half mile of the 38th/Blake Station rail platform. In other areas, all uses within one-quarter mile of a rail station or high-frequency transit corridor qualify for a 25% parking reduction. This is available in all districts except for the Urban Center context, where the 25% reduction is already built into the code.

In addition to the 5 general zoning code contexts, Denver's approach to parking has been on a project by project basis. If the City is undertaking a zoning update or working on area plans, the City will update parking requirements for that specific area

GOALS

The City of Denver's approach was more piecemeal in their parking reform. Due to this, there was not one overarching goal that guided the effort. Instead, one of the City's goals was to be consistent with the various plans the City had adopted over time which contained directives to adjust parking requirements. More significantly, in locations within a quarter mile of rail stations, the goal for eliminating parking requirements was to remove barriers to development and encourage higher densities.

City staff stated that in most cases, especially when the reduction in parking was coupled with zoning changes that increased allowable height, the approach has been largely successful.

CURRENT POLICIES

Parking requirements for the City of Denver are housed in its zoning code. Each of the above referenced contexts have their own Article within the zoning code. Off-street parking requirements for each use are itemized in each Article. The parking reduction due to proximity to transit is housed in Article 10. Denver's parking policies for non-residential uses are summarized in **Table 8**.

Table 8: Parking Requirements for Non-Residential Uses: Denver

Policies	
Zero Required Parking for Non-Residential Uses	* Most of Downtown * River North, if the site is within ½-mile of the 38th/Blake Station * Small lots (6,250 sq. ft. or less) within ½-mile of rail or ¼-mile of high-frequency transit corridor
Reductions to Minimum Required Parking allowable	* Proximity to Multi-Modal Transportation – within ¼-mile of Rail Transit Platform or enhanced transit corridor, 25% reduction * Off-Site Car-Sharing – reduction determined by Zoning Administrator * Bike Share – located in same building, on same lot or in public ROW abutting property, reduction of 1 vehicle parking space for each 5 bike share parking spaces

LIST OF LESSONS LEARNED FROM CONVERSATION WITH CITY OF DENVER STAFF

- Previously, parking did not count toward FAR. Now parking is not required but if it is above ground it counts toward FAR. If parking is underground, it does not count toward FAR
- Denver seems to be seeing two types of developments: (1) providing no parking or taking advantage of every reduction available or (2) providing more parking than previously required
- Maximum allowable parking ratios were more difficult to establish and implement for Denver

MINNEAPOLIS

	San Diego	Minneapolis
Population	1,390,966	411,452
Pop. per Sq Miles	4,277	7624
Jobs per HH	1.43	1.40
Jobs per Sq. Mile	2,224	4,579
Bike Commuters	1.0%	4.1%
Walk Commuters	3.1%	7.0%
Transit Commuters	4.0%	13.4%
Carpool	8.6%	7.9%
Transit Ridership per Capita	0.08	0.05
Vehicles per Household	1.86	1.54

Table 9: Minneapolis: Demographics

The City of Minneapolis started reforming parking requirements in 2009 and since that time have updated parking about every two years. In 2009, the City realized that some uses had high parking requirements, such as restaurants and coffee shops, where the requirements were set to meet parking demand when the facility was at capacity. Additionally, the City noticed that they were granting a lot of parking variances to get the result that they actually wanted.

At that time, the City eliminated parking requirements for the Downtown District, for both residential and commercial uses, adopted citywide maximums to help prevent the oversupply of parking, and adopted minimum bicycle parking standards. In 2013, the City targeted parking relief for certain uses and in 2015 adjusted parking requirements for multi-family residential and tied it to high frequency transit. In 2016, the City eliminated minimum parking requirements in commercial corridors. In 2017, the changes were building design focused regarding podium parking.

The City of Minneapolis recently adopted a Comprehensive Plan, *Minneapolis 2040*, which went into effect in January 2020. Complete elimination of all minimum parking requirements citywide is a policy contained in the adopted comprehensive plan.

GOALS

For the City of Minneapolis, the adjustments to the parking requirements were intended to meet several policy goals:

- Environmental and transportation goals
- Housing affordability goals
- Provide regulatory relief by allowing the market to determine supply
- Urban design goal – make it so parking is not the most important issue for developers

CURRENT POLICIES

Minneapolis's general off-street parking requirements can be found in Chapter 541 Article III Section 170 of the Zoning Code (Title 20). Reductions to the requirements are covered in Article IV. Table 10 provides a summary of the City of Minneapolis' parking policies.

Table 10: Parking Requirements for Non-Residential Uses: Minneapolis

Exceptions	
Zero Required Parking for Non-Residential Uses	* Downtown District * Building spaces of 1,000 sq. ft. or less
Reductions to Minimum Required Parking (Chapter 541, Article IV)	* Shared Parking * 10% reduction for non-residential uses if the use provides an adequate sheltered transit stop within the development (541.200(2)) * Parking requirements may be fulfilled by providing a valet (restaurants, hotels and theaters) (541.210) * 10% or 1 space reduction whichever is greater, where bicycle parking is provided equal to 25% of the number of required parking spaces (541.220) * Pedestrian Oriented Overlay District[6] – 75% of required

LIST OF LESSONS LEARNED FROM CONVERSATION WITH CITY OF MINNEAPOLIS STAFF

- Adjusting parking requirements has been one factor in the increased density of development.
- Since parking requirements have been adjusted much smaller scale developments are feasible, as well as more mixed-use development.

There are multiple benefits to adjusting parking requirements – all the issues overlap in a Venn Diagram – this is an effective way to display the information to the public.

[6] Minneapolis has a Pedestrian Oriented Overlay District. The boundaries are shown on their official zoning map. In the Pedestrian Overlay District, the minimum off-street parking requirements for nonresidential uses shall be 75% of the minimum requirement and maximum allowable shall be 75% of the maximum

4. Peer City Trends

The modality which people choose to commute to work is determined by a number of factors, including the land use context of where the place of employment is located and the availability of parking. Since the peer cities have eliminated non-residential parking requirements in TPA equivalent areas, Commute Mode Share (Drive Alone, Public Transportation and the combined mode share of biking and walking to work, as Active Transportation) was reviewed for each city individually and then comparatively across all five cities.

Commute Mode Share

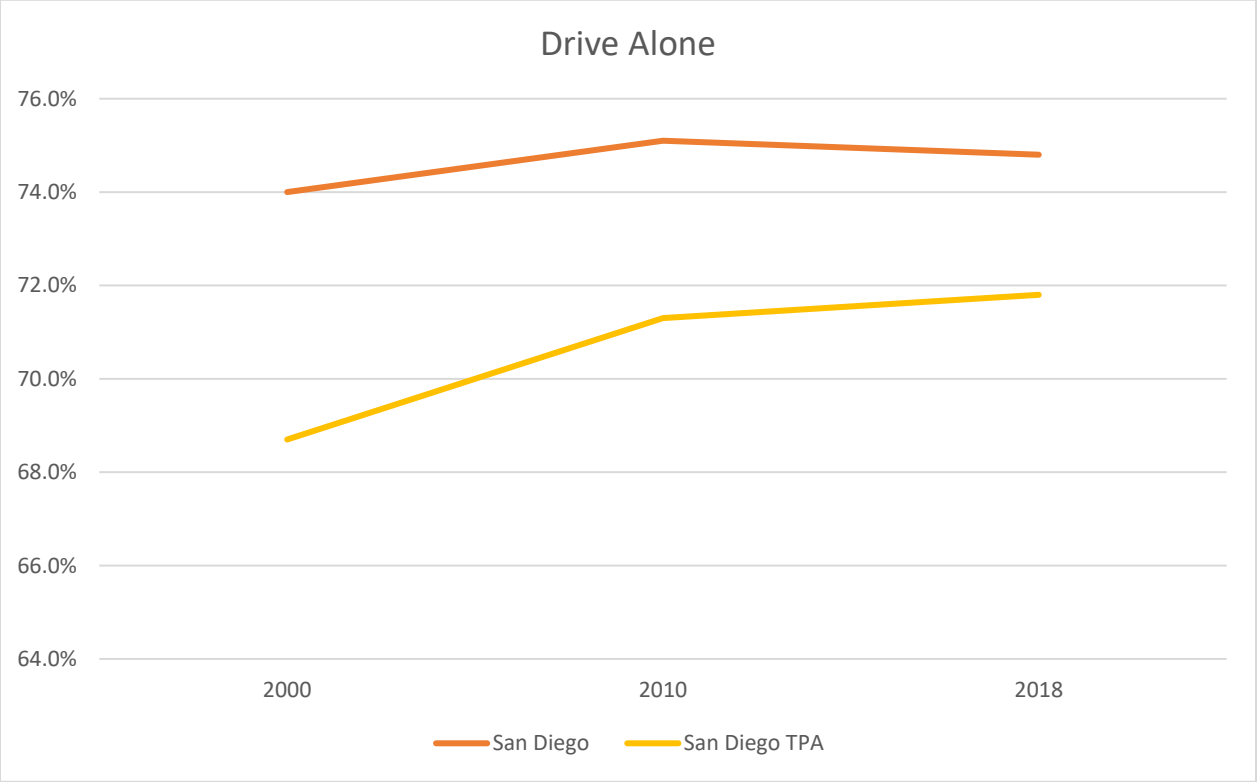
Using American Community Survey data, the Commute mode shares for each Peer City was analyzed over the same time-period (2000 to 2018). This data was evaluated on both a citywide level and within areas comparable to TPAs.

Commute mode share can be influenced by the availability of parking at work. In other words, if someone lives outside of a TPA but works within a TPA, reduced parking at the place of employment could convert that trip into a transit trip where the individual drives to a park-and-ride, then takes transit to work. This is in line with San Diego's CAP goals, in particular Strategy 3, which aims to reduce VMT, improve mobility and promote alternative modes of travel, along with revising parking standards.

San Diego

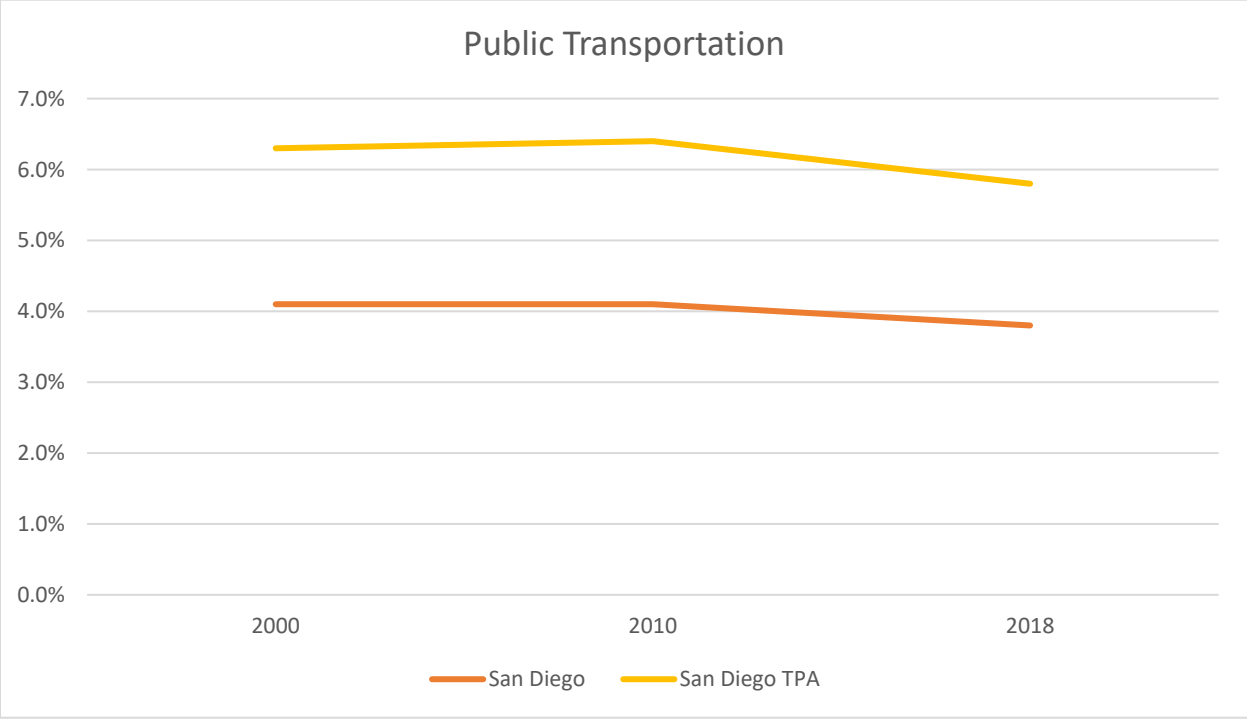
For the City of San Diego, from 2000 to 2018, the drive alone commute mode share increased, the public transportation commute mode share decreased and the active transportation (defined as combined walking and biking commutes) decreased, as shown below in Figures 2-4.

Figure 2: City of San Diego Drive Alone Commute Mode Share (2000 to 2018)



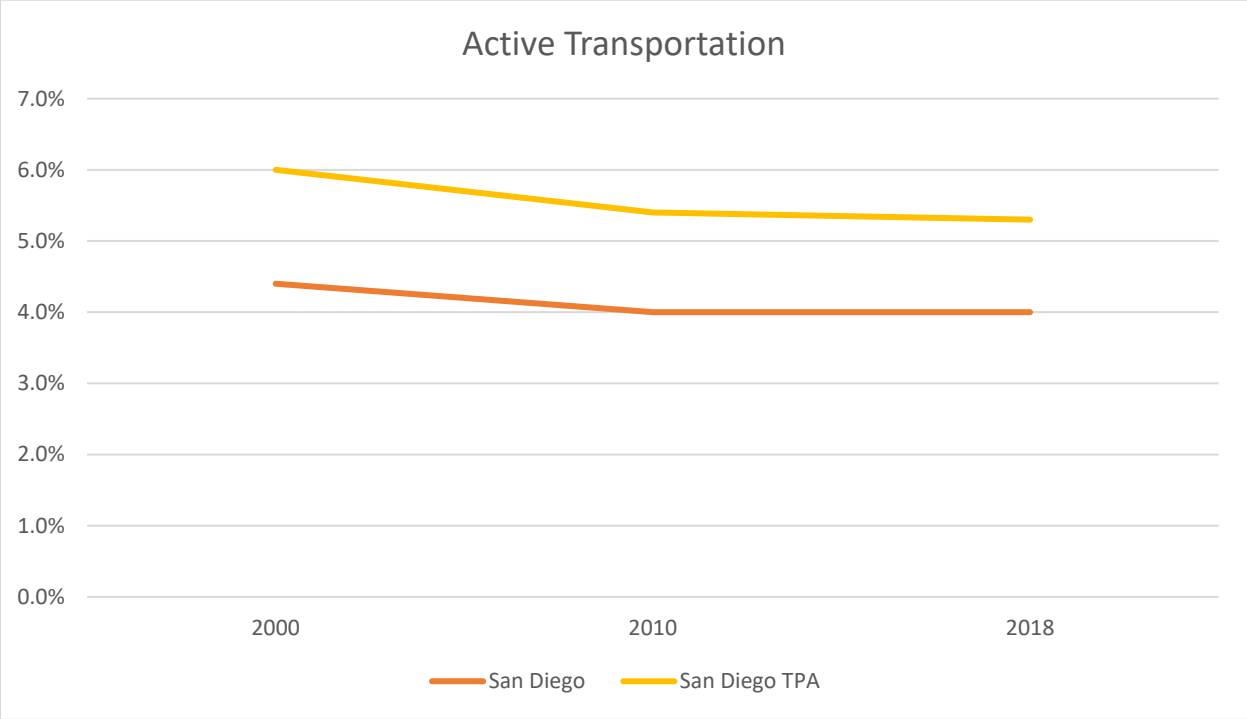
Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 3: City of San Diego Public Transit Commute Mode Share (2000 to 2018)



Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 4: City of San Diego Active Transportation Commute Mode Share (2000 to 2018)

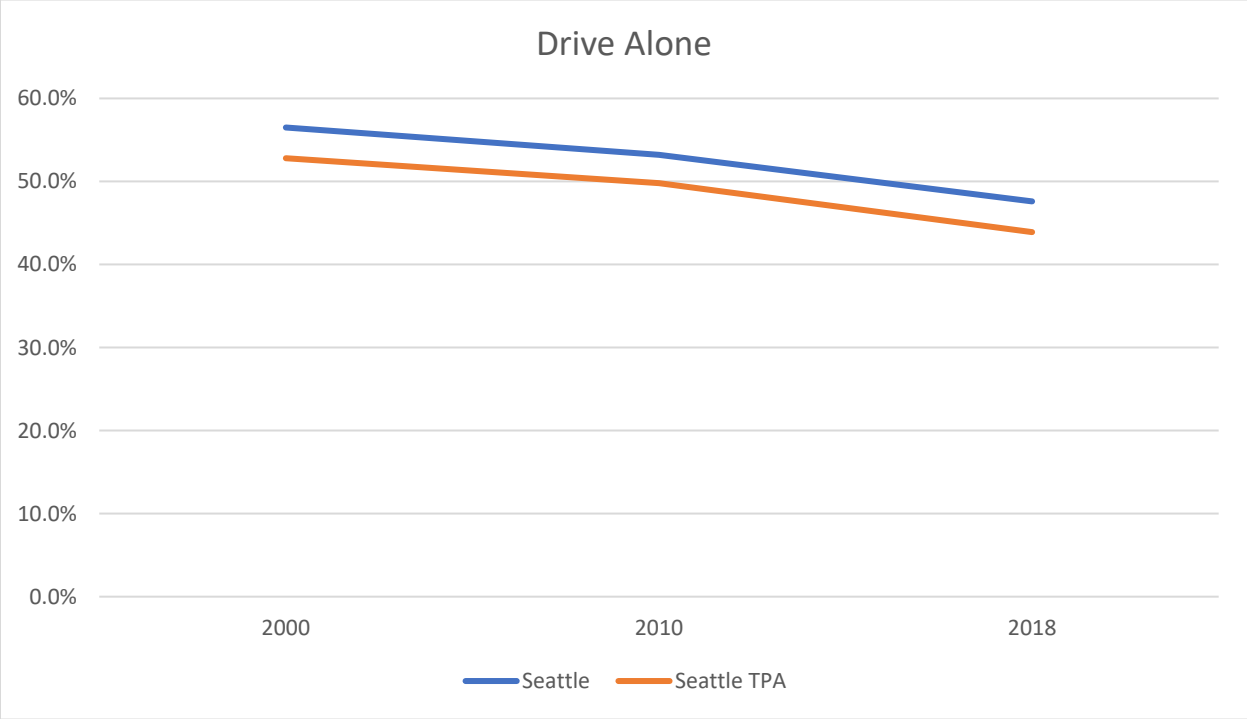


Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Seattle

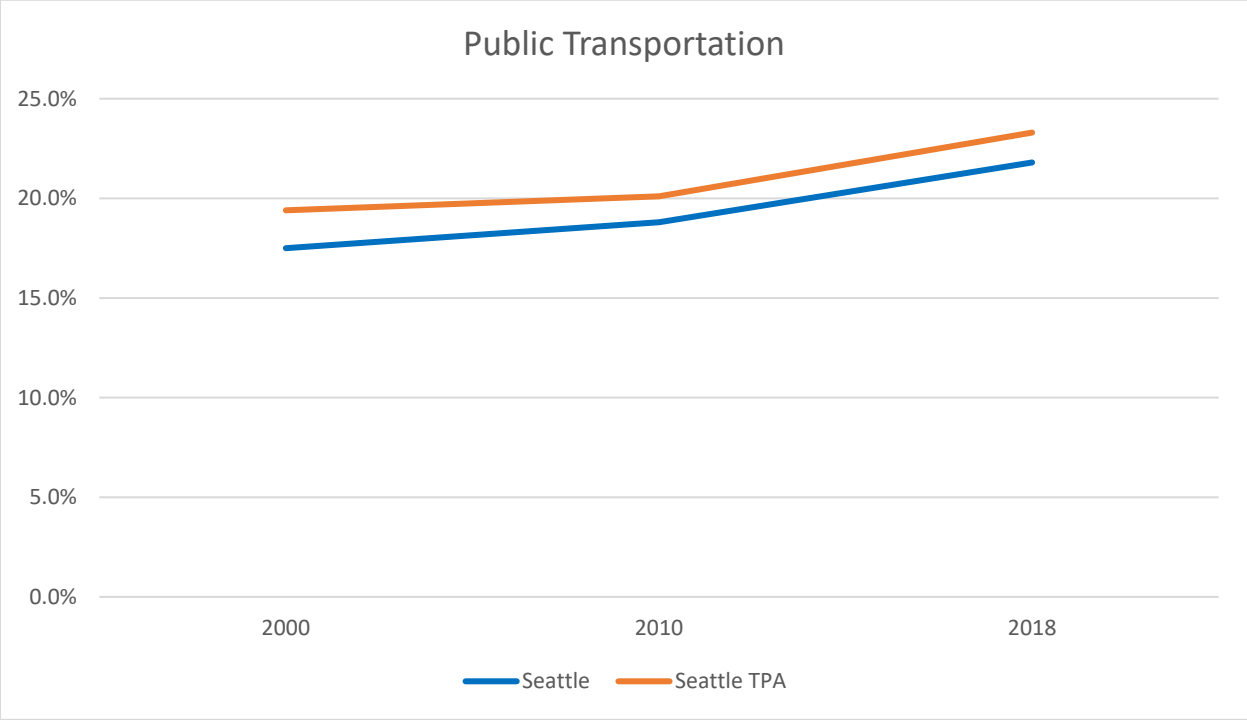
For the City of Seattle, from 2000 to 2018, the drive alone commute mode share decreased, the public transportation commute mode share increased and the active transportation (defined as combined walking and biking commutes) increased, as shown below in **Figures 5-7**.

Figure 5: City of Seattle Drive Alone Commute Mode Share from (2000 to 2018)



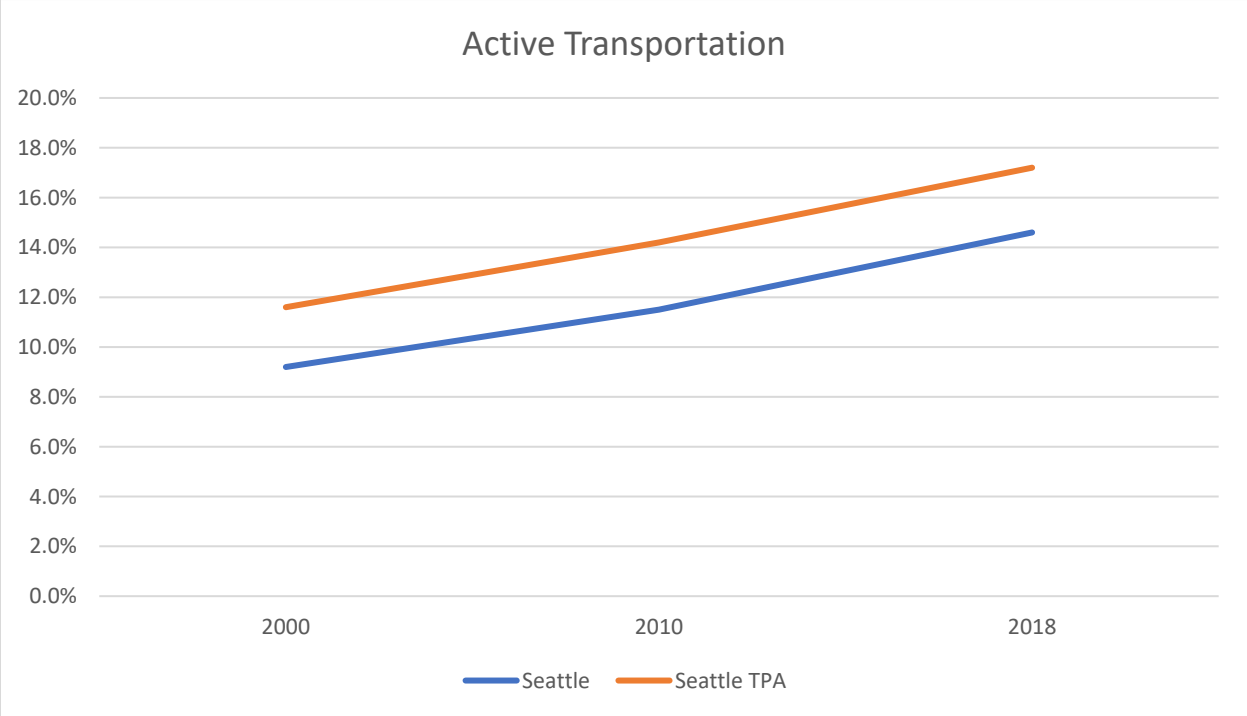
Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 6: City of Seattle Public Transportation Commute Mode Share from (2000 to 2018)



Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 7: City of Seattle Active Transportation Commute Mode Share from (2000 to 2018)

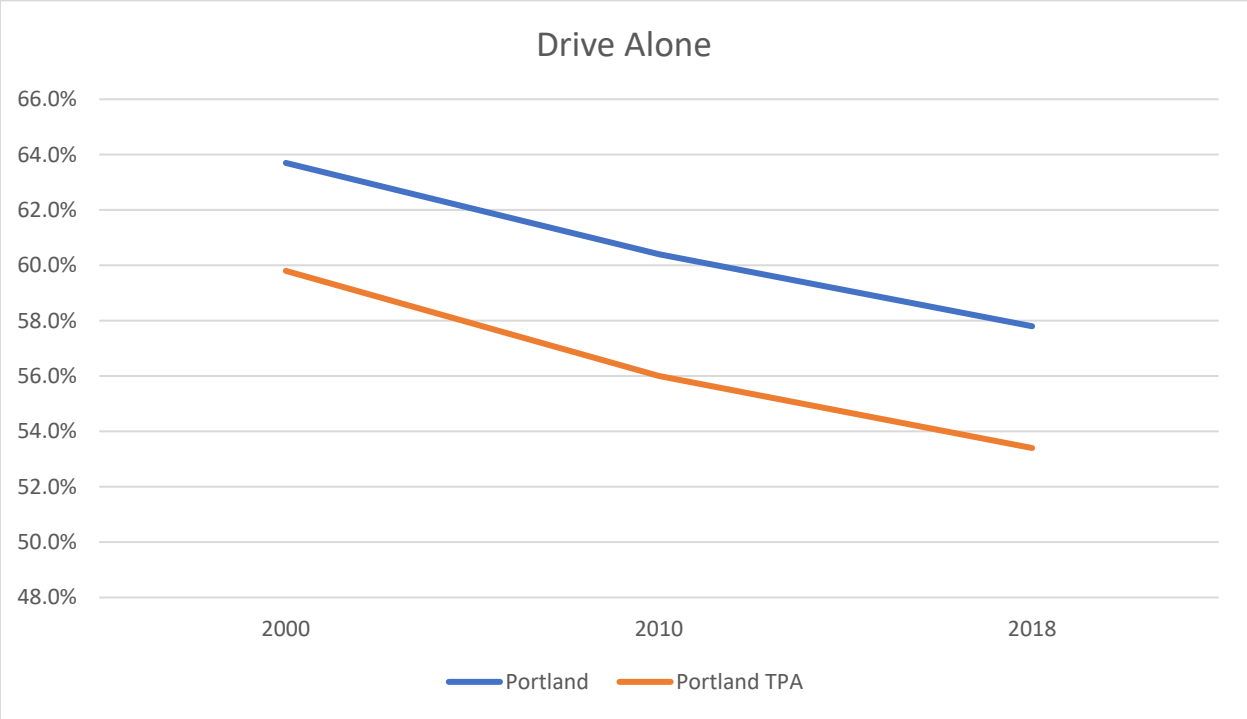


Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Portland

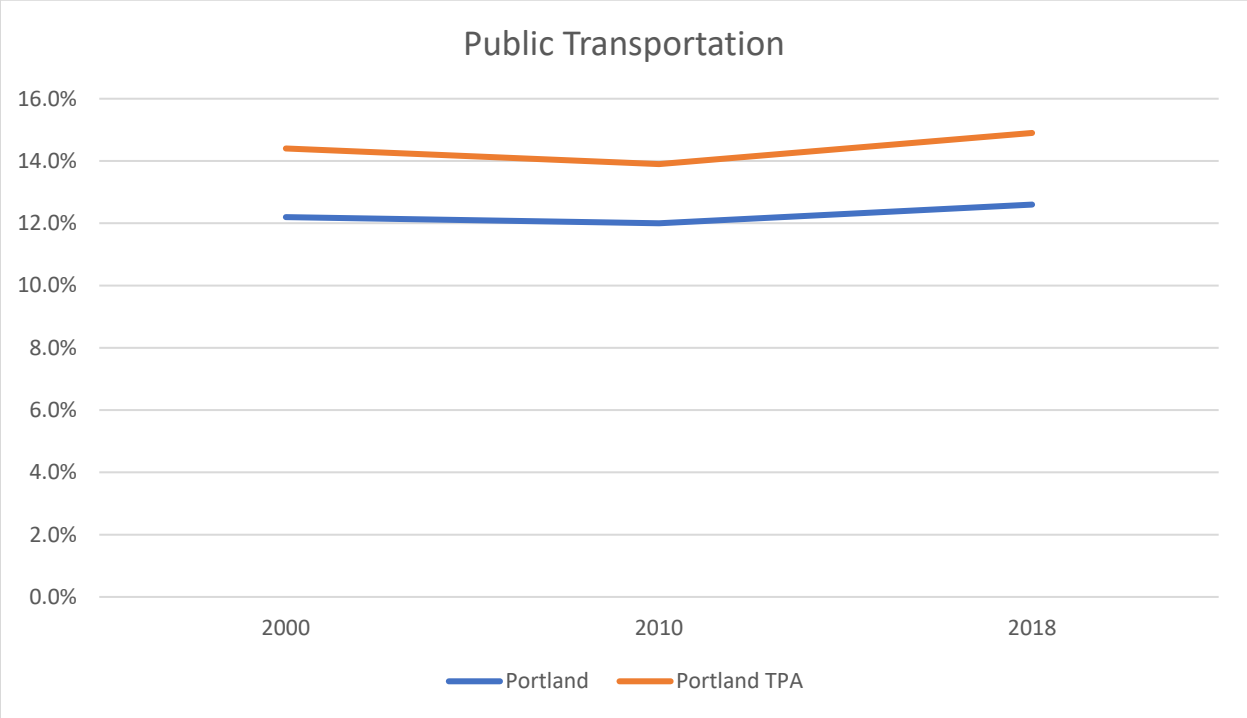
For the City of Portland, from 2000 to 2018, the drive alone commute mode share decreased, the public transportation commute mode share increased from a 2010 dip, and the active transportation (defined as combined walking and biking commutes) increased, as shown below in **Figures 8-11**.

Figure 8: City of Portland Drive Alone Commute Mode Share from (2000 to 2018)



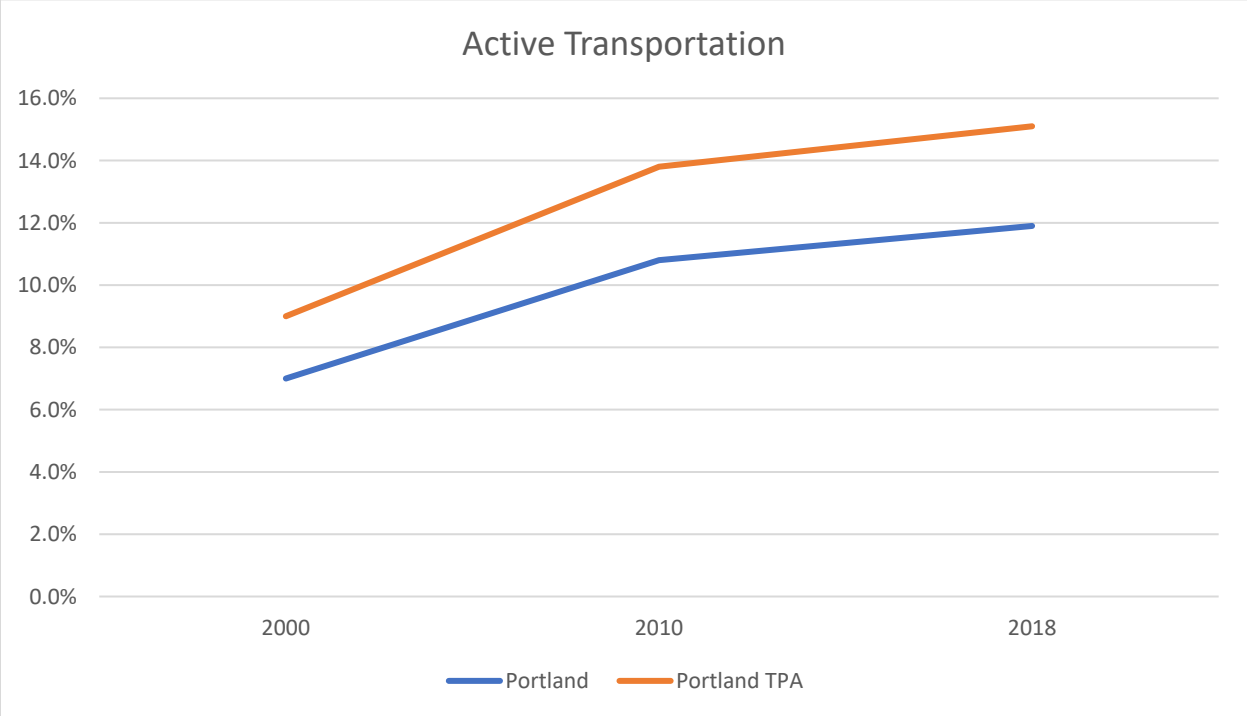
Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 9: City of Portland Public Transportation Commute Mode Share from (2000 to 2018)



Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 10: City of Portland Active Transportation Commute Mode Share from (2000 to 2018)

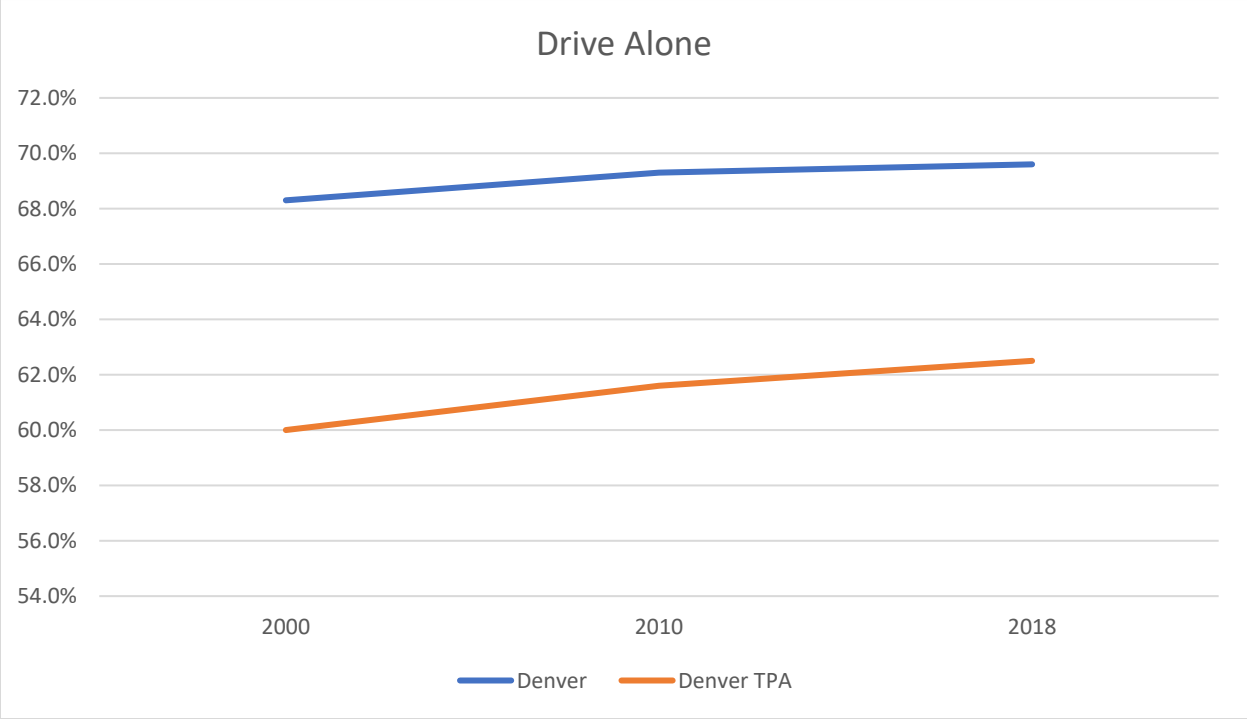


Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Denver

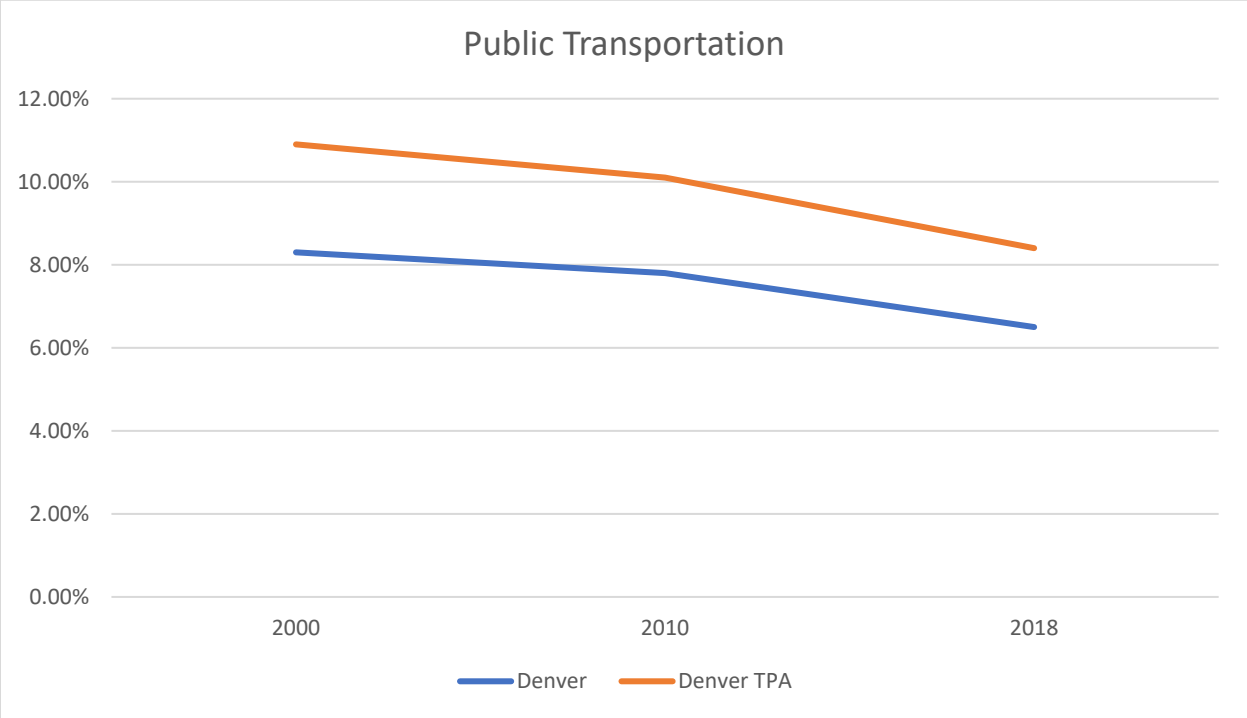
For the City of Denver, from 2000 to 2018, the drive alone commute mode share citywide declined slightly from 2010 to 2018 while the public transportation commute mode share declined citywide and increased slightly within the TPAs from 2010. The active transportation (defined as combined walking and biking commutes) commute mode share increased, as shown below in **Figure 11 – 13**.

Figure 11: City of Denver Drive Alone Commute Mode Share from (2000 to 2018)



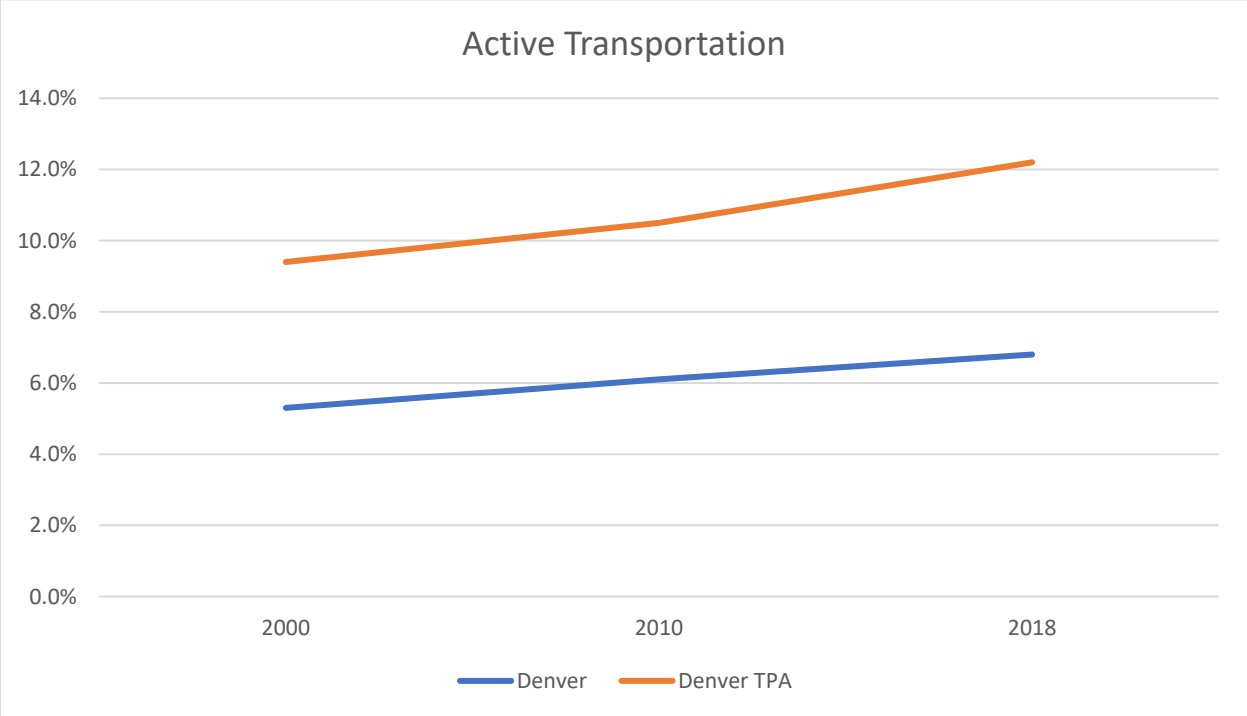
Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 12: City of Denver Public Transportation Commute Mode Share from (2000 to 2018)



Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 13: City of Denver Active Transportation Commute Mode Share from (2000 to 2018)

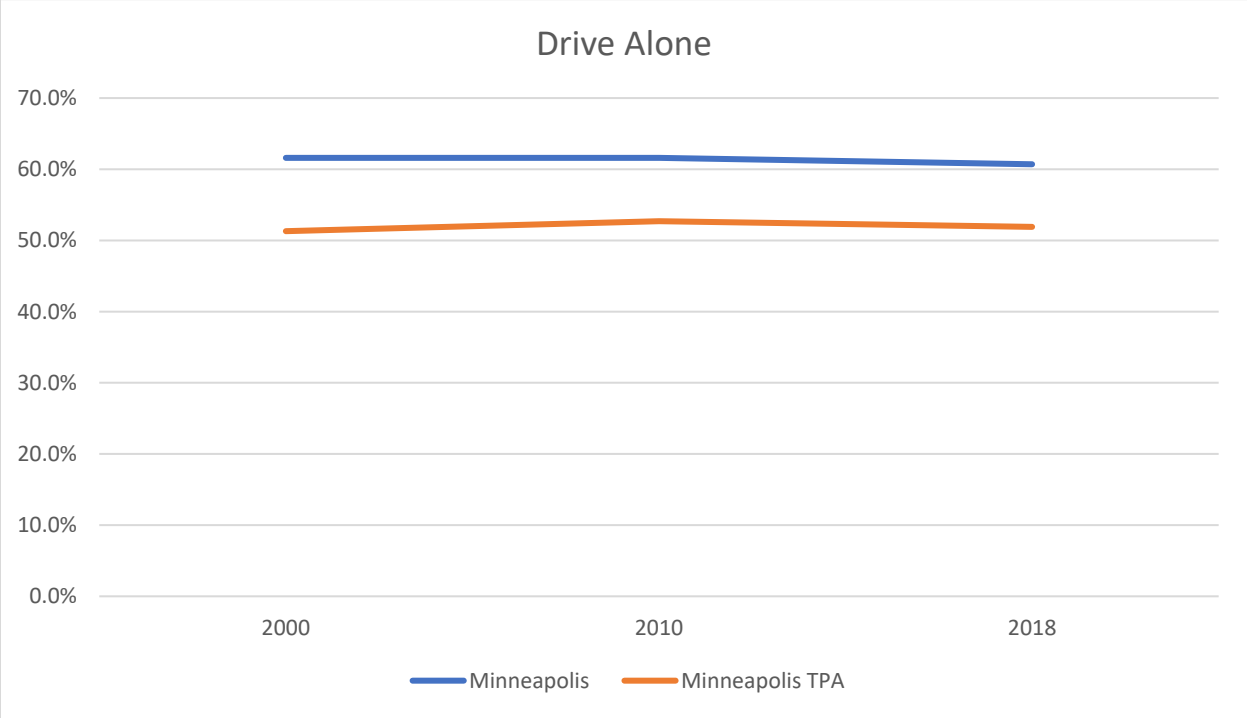


Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Minneapolis

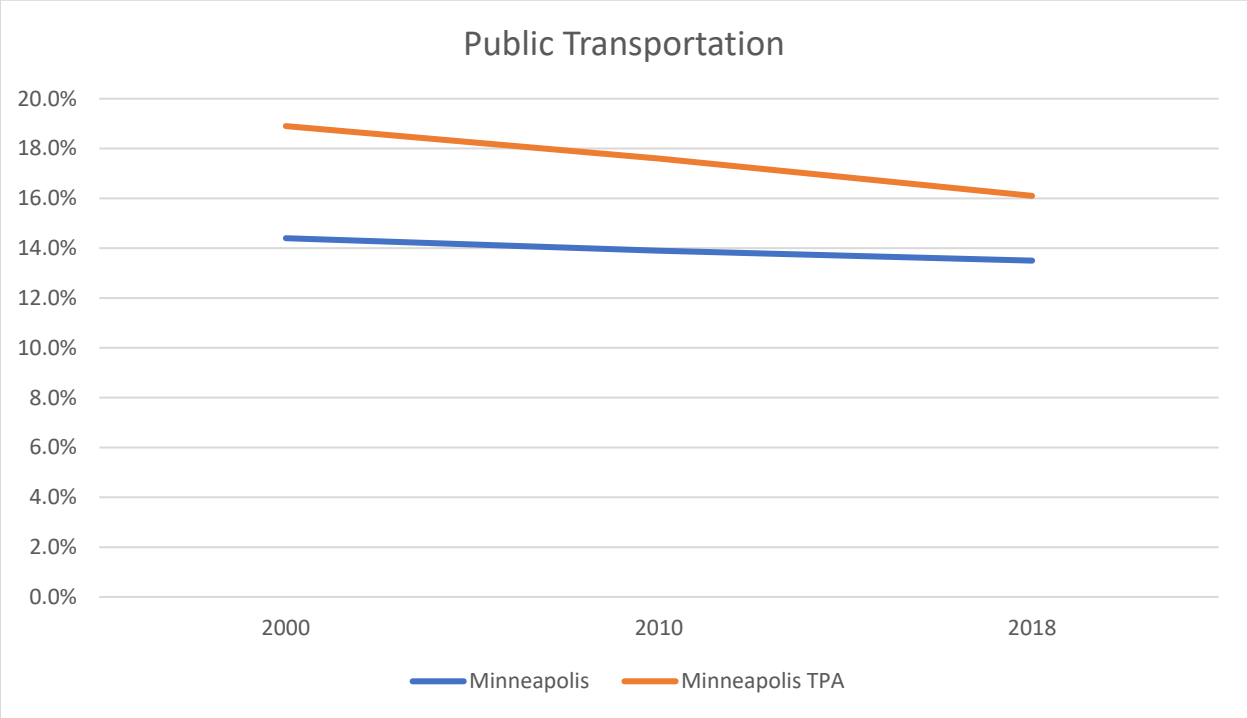
For the City of Minneapolis, from 2000 to 2018, the drive alone commute mode share citywide declined slightly from 2010 to 2018 while the public transportation commute mode share declined citywide and increased slightly within the TPAs. The active transportation (defined as combined walking and biking commutes) commute mode share increased, as shown below in **Figures 14-16**.

Figure 14: City of Minneapolis Drive Alone Commute Mode Share from (2000 to 2018)



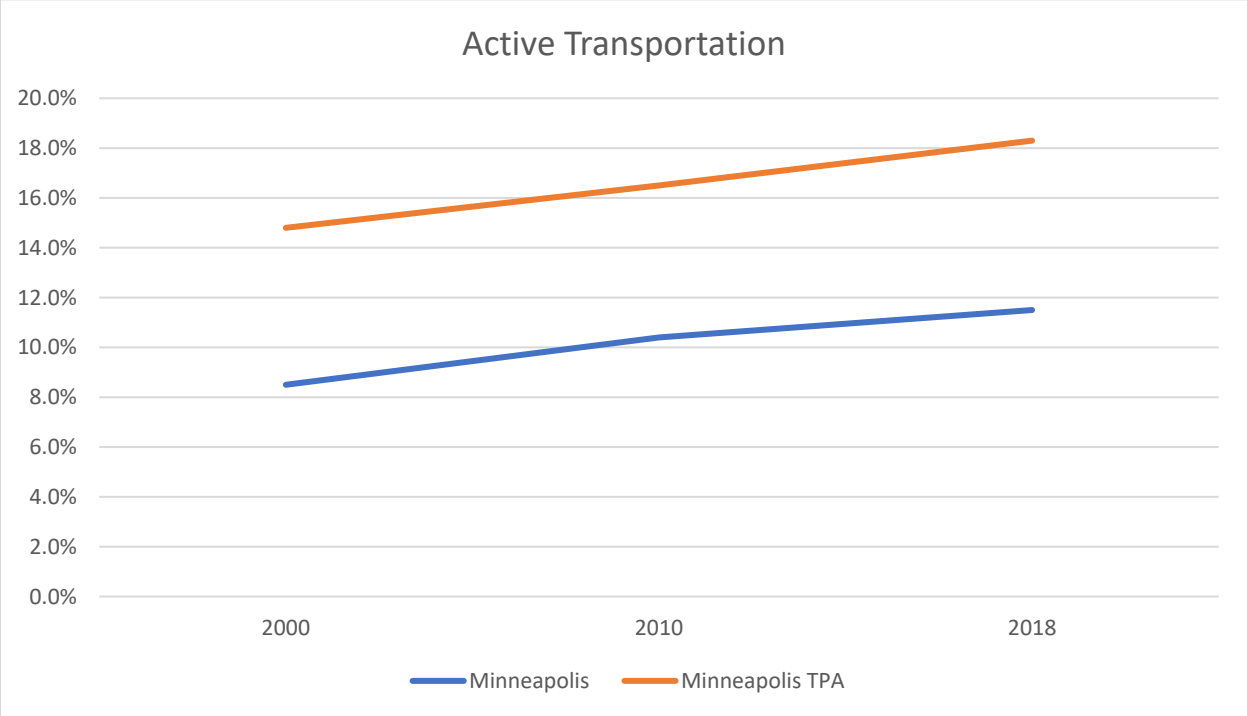
Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 15: City of Minneapolis Public Transportation Commute Mode Share from (2000 to 2018)



Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Figure 16: City of Minneapolis Active Transportation Commute Mode Share from (2000 to 2018)



Source: US Census, American Community Survey, 2000, 2010, and 2018 5-year estimate

Comparison of Commute Mode Share Among Example Cities Within TPAs

When looking at the Peer Cities and the trends in their TPA-equivalent areas, the reduction in drive alone rates and the increase in public transit and active transportation is noticeable for Seattle and Portland. Both cities have longer histories with parking reform for non-residential uses and both have taken a more comprehensive approach.

As can be seen, for the City of Denver, the drive alone rate within TPA's trended up and the public transit commute rates trended down, over the 18 years. In conversations with the city staff, they noted that Denver's approach to parking reform has been piecemeal in nature and not comprehensive. It is possible that has undercut some of the possible positive effects parking reform can have on commute mode share. However, had Denver not implemented parking requirement reductions, the trends could likely have been worse.

The drive alone rate has held steady for TPAs within the City of Minneapolis, while the public transit commute rates has trended down, over the last 18 years. It may be too early to tell the effects of Minneapolis' efforts, as their recently adopted Comprehensive Plan, *Minneapolis 2040*, which went into effect in January 2020 calls for the elimination of all minimum parking requirements citywide.

Figures 17 – 19 display the mode shares within TPAs amongst the five cities.

Figure 17: Drive Alone Mode Share within TPAs for Peer Cities and San Diego

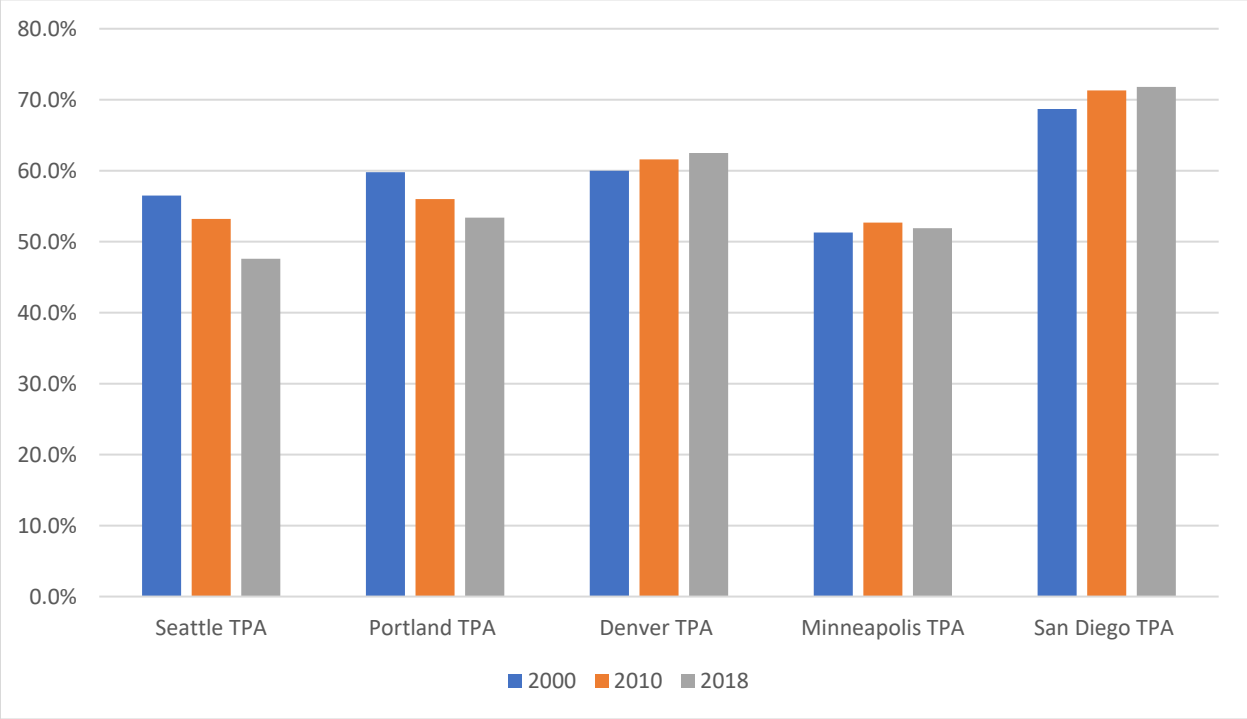


Figure 18: Transit Mode Share within TPAs for Example Cities and San Diego

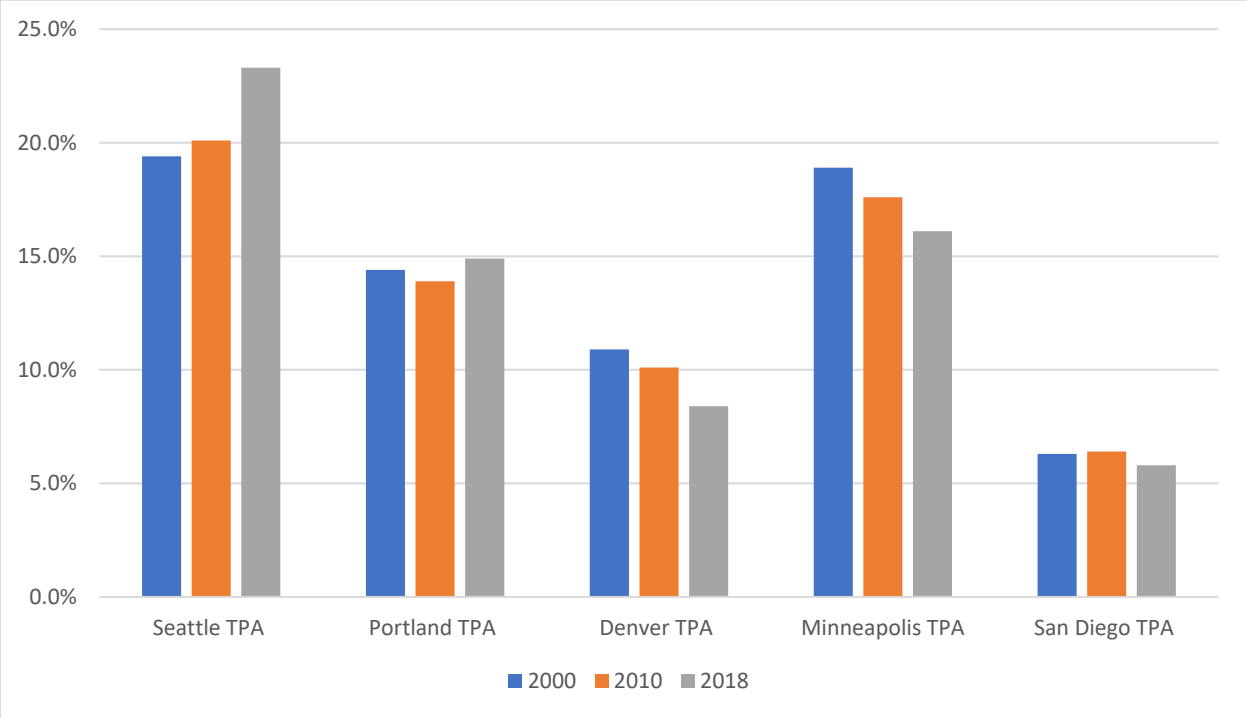
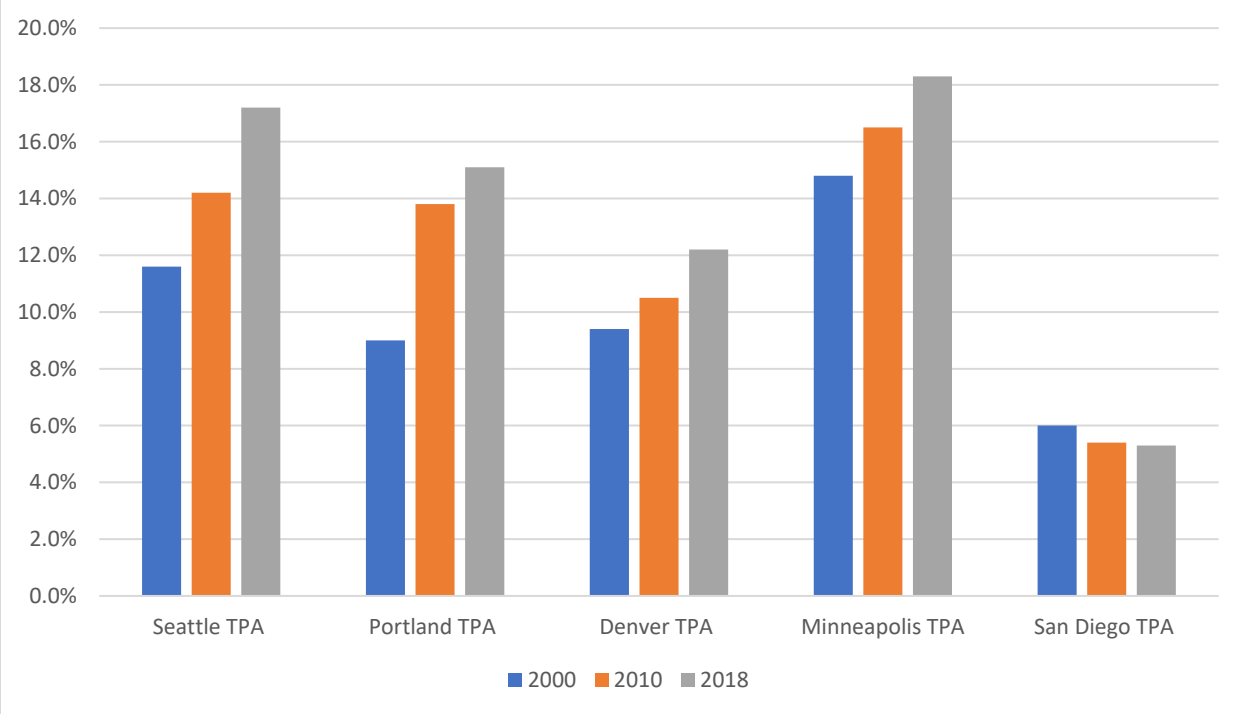


Figure 19: Active Transportation Mode Share within TPAs for Example Cities and San Diego



5. Transportation Demand Management

Transportation Demand Management (TDM) is the wide-ranging transportation planning practice aimed at decreasing drive-alone trips, and parking demand, by way of increasing incentives to carpool, walk, bicycle, or ride transit. Employing these types of strategies along with reducing the parking requirements can both help to reduce single occupancy vehicle trips and GHG, but also help to limit spill over parking into adjacent areas. For these reasons It is common for jurisdictions to implement a TDM program in conjunction with lowering or eliminating off-street parking requirements, as the City did with the Multi-Family Parking Requirements in TPAs.

Common examples of TDM include providing subsidized transit passes for employees, establishing Emergency Ride Home programs for employees that bike, walk, take transit or carpool to work, and offering cash incentives to employees who do not drive alone to work.

San Diego is a growing city, with most of its growth planned to occur in TPAs. With growth comes more congestion and parking demand, unless strategies and tools are implemented to help people change their travel behavior and use modes other than driving alone.

The City of San Diego's General Plan indicates the various policies aimed to reduce vehicles emissions and single-occupant vehicle commuting. TDM is a tool that the City of San Diego is using to address the impacts of growth. TDM can be highly effective at a relatively low cost – if the right measure is applied in the correct location.

Supportive Research and Data

Over the last 15 years several research efforts have been conducted, both locally and nationally, regarding the effectiveness associated with different TDM strategies. As mentioned in the introduction, studies such as the CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures, 2010*, SANDAG's *Parking Strategies for Smart Growth, 2010*, and *TCRB's Traveler Response to Transportation System Change, 2004*, have quantified the benefits of parking reductions and made recommendations for local jurisdictions to implement such reductions. Theses complete reports can be found as Attachments 3 through 5 to this report.

The CAPCOA study has been utilized by most jurisdictions throughout the State over the last decade to identify and calculate mitigation strategies associated with GHG related impacts. The study provides a wide variety of quantifiable GHG reduction strategies across a number of uses, including transportation. The majority of transportation strategies revolve around measures to reduce VMT, which ultimately leads to a reduction in GHG. The CAPCOA report quantifies that reduced parking can realize up to a 13% reduction in VMT. This reduction in VMT directly aligns with the with both the City's CAP goals, as well as the overall goals of this program (outlined in Chapter 1).

While the CAPCOA study identifies the VMT and GHG reduction benefits associated with reduced parking, the SANDAG and TCRB reports identify the reduction in parking demand that is associated with TDM strategies. Both SANDAG's and TCRB's reports show that most local jurisdictions, that control parking regulations, require developments to provide for more parking than is needed and realized by way of 85th percentile occupancy; therefore, both studies recommend parking reductions in combination with other TDM and Smart Growth Strategies. Similar to the CAPCOA study, the findings and recommendations of

these reports directly aligns with the with both the City's CAP goals, as well as the overall goals of this program (outlined in Chapter 1).

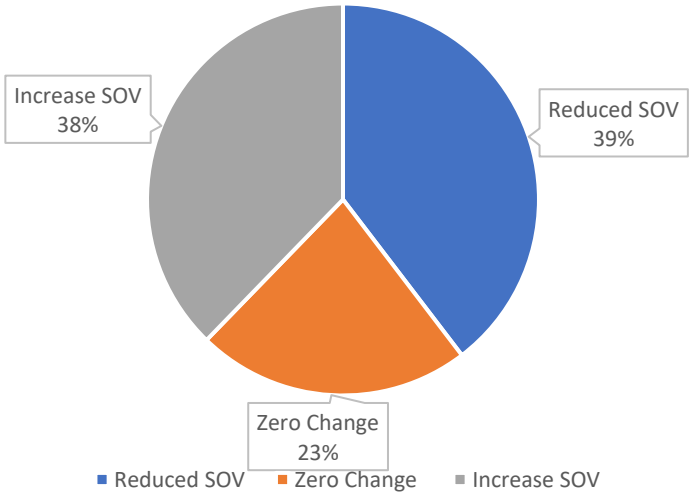
Effectiveness of Local TDM Programs (iCommute)

The San Diego Association of Governments (SANDAG), which is the San Diego region's metropolitan planning organization (MPO), administers a TDM program by the name of iCommute. The iCommute program offers commuter assistance, employer services and support for local jurisdictions. As part of their employer services, SANDAG helps employers develop and implement customized employee commuter benefit programs. Once an Employer has established a program, every two years, SANDAG sends the employer a survey regarding commute travel behavior to be distributed amongst employees.

SANDAG maintains a database of employers who participate in the program. The data is voluntarily self-reported and derived from responses to SANDAG's iCommute survey, which is administered every 24 months. The database allows for change in parking demand and single occupancy vehicle commute rates to be tracked over time. As of this writing, there are currently 53 employers who participate in the iCommute program and actively provide information for the database. Of the 53 employers, 27 were located within TPAs and 26 were located outside of TPAs. The following figures and statistics were derived from the historic commute that data contained within the iCommute database.

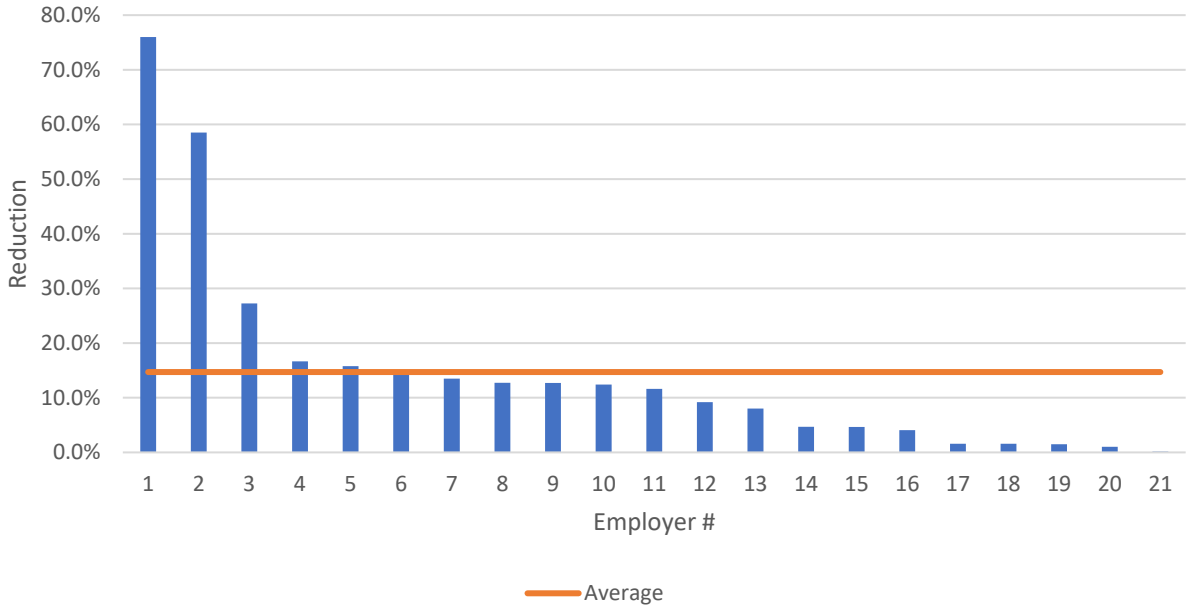
As shown in **Figure 20**, out of the 53 employers, 21 saw a decrease in single occupancy vehicle (SOV) trips, 12 employers experienced no change in their SOV trips, and 20 employers saw an increase in SOV trips (though it should be noted, other contributing factors such as a growth in workforce, etc. were not accounted for in the database).

Figure 20: All Employers for Whom Change Could Be Measured



As shown in **Figure 21**, of all the participating employers who saw a decrease in SOV, the average decrease was 14.7%. The change in SOV spanned from 0.14% to 76%.

Figure 21: Average Decrease in SOV Trips Across All Employers Who Realized a Reduction

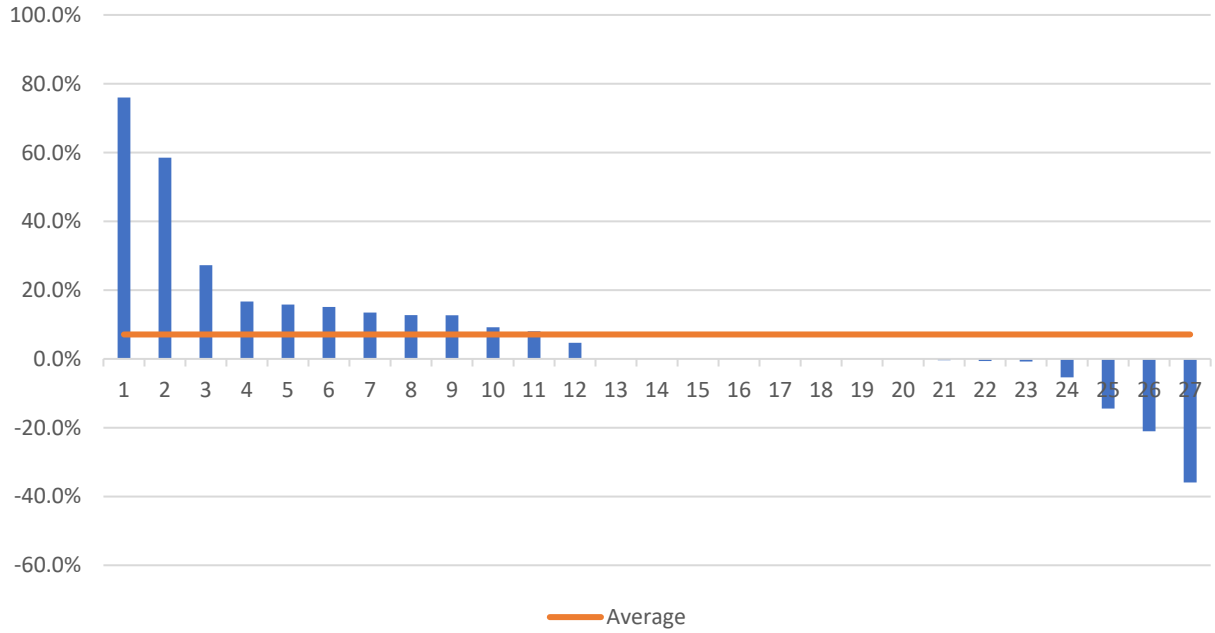


Note: Employer # is included as a place holder to keep the identity of the business private. Please note that the Employer numbers will change from figure to figure.

Employers Within TPAs

Within TPAs, the average change across all employers (for whom change over time could be measured), was a 7.1% decrease in SOV trips, as shown in **Figure 22**.

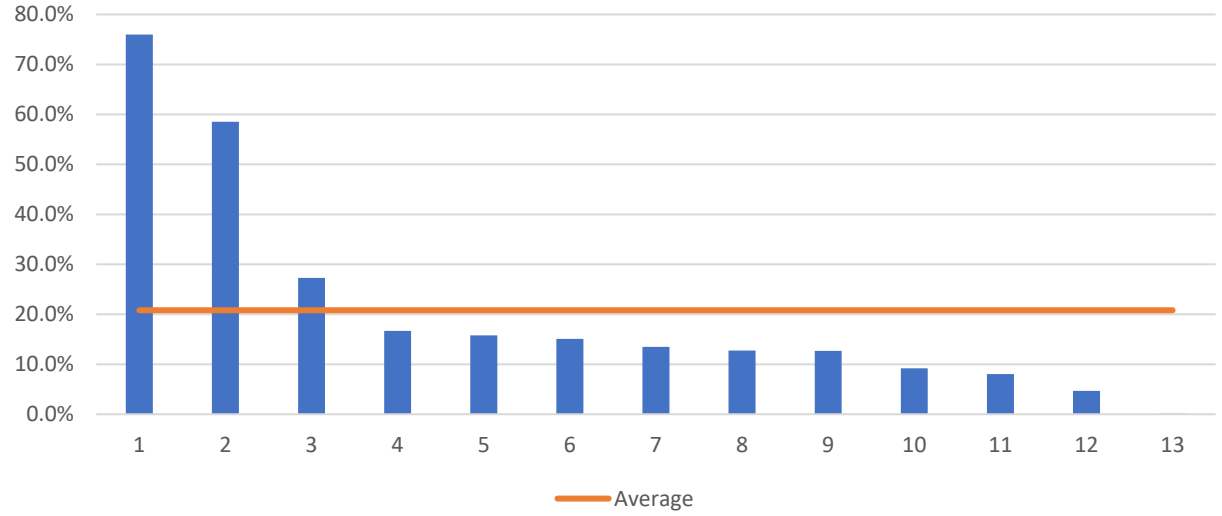
Figure 22: Average Decrease in SOV Trips for Employers within TPAs



Note: Employer # is included as a place holder to keep the identity of the business private. Please note that the Employer numbers will change from figure to figure.

Whereas for the employers located within TPAs who realized a decrease in SOV trips, the average reduction was 20.8%, as shown in **Figure 23**.

Figure 23: Average Decrease in SOV Trips for Employers within TPAs who Realized Reductions

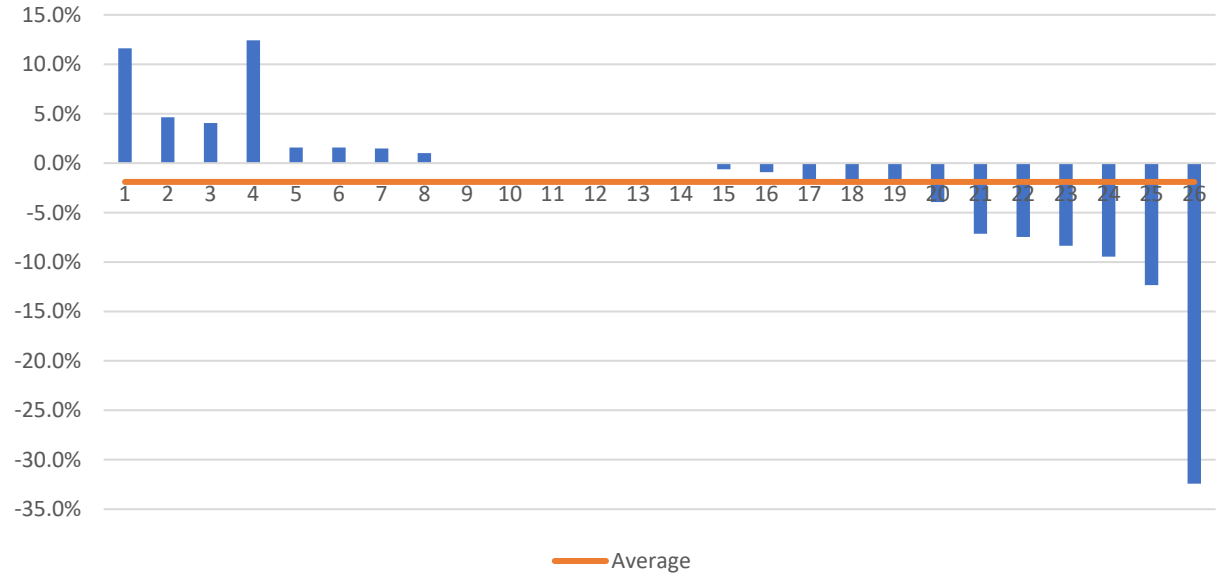


Note: Employer # is included as a place holder to keep the identity of the business private. Please note that the Employer numbers will change from figure to figure.

Employers Outside of TPAs

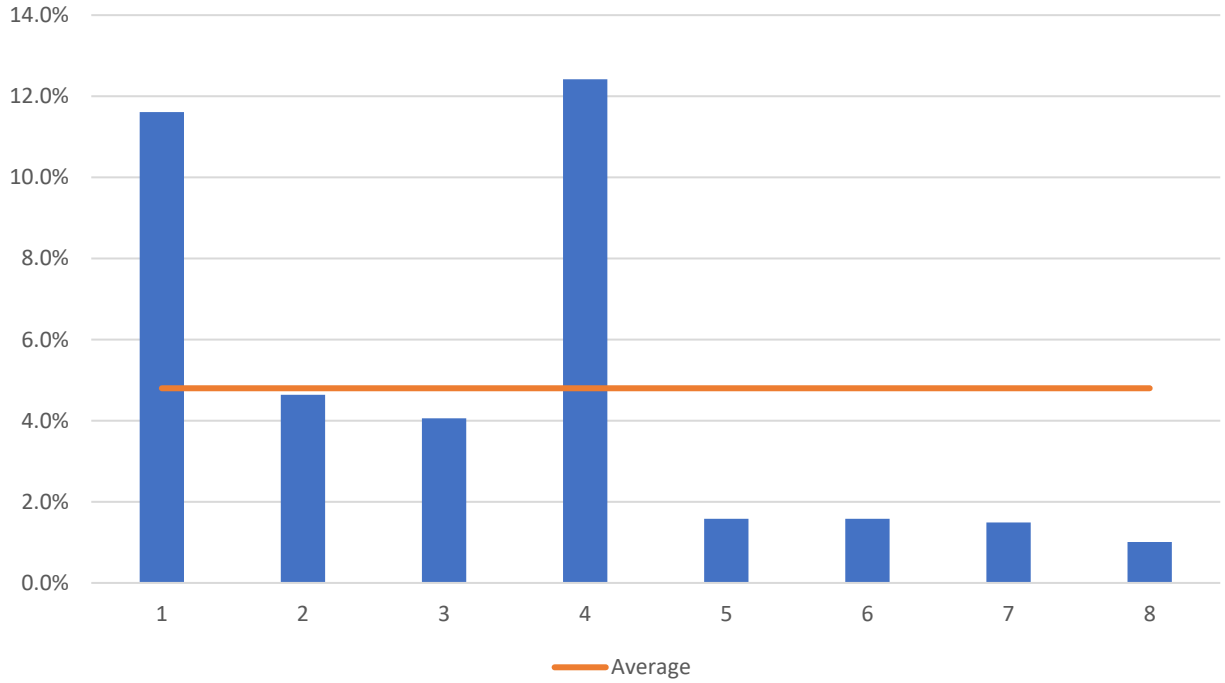
Outside of TPAs, the average change across all employers (for whom change over time could be measured), was a 1.9% increase in SOV Commuters. For this same set of employers located outside of TPAs, for those which realized a decrease in SOV trips, the reduction was an average of 4.8%, as shown in **Figures 24 & 25**, respectively.

Figure 24: Average Decrease in SOV Trips for Employers outside of TPAs



Note: Employer # is included as a place holder to keep the identity of the business private. Please note that the Employer numbers will change from figure to figure.

Figure 25: Average Decrease in SOV Trips for Employers outside of TPAs who Realized Reductions

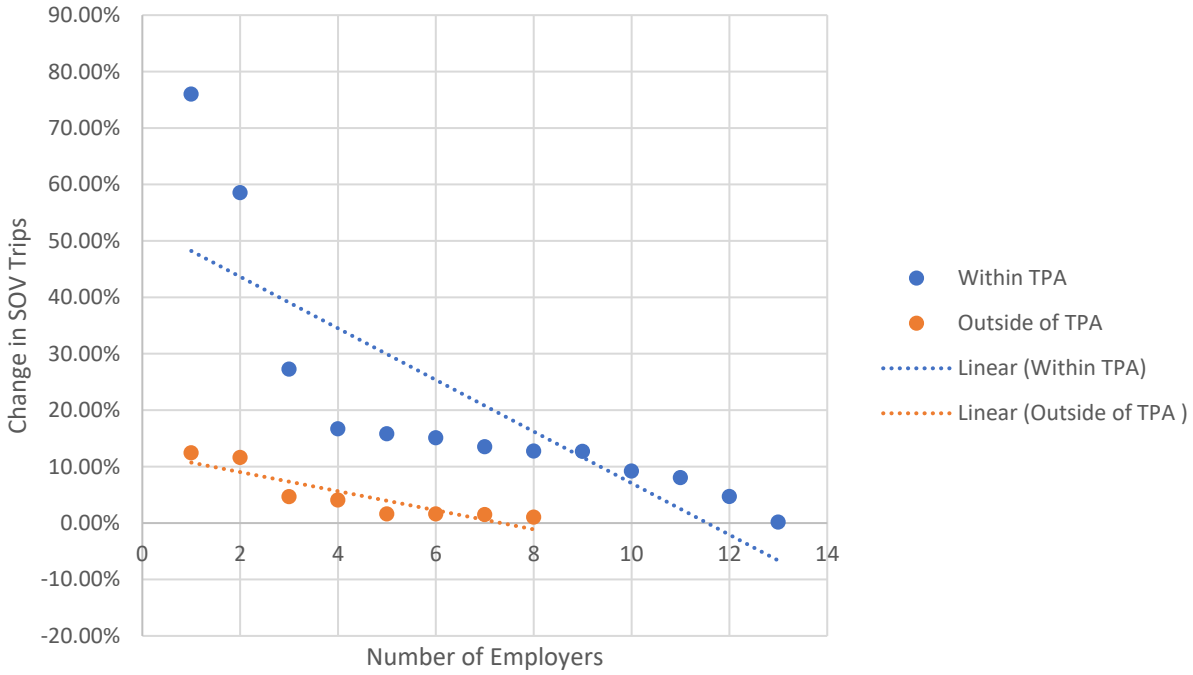


Note: Employer # is included as a place holder to keep the identity of the business private. Please note that the Employer numbers will change from figure to figure.

Additional analysis was conducted for all employers who saw a decrease regardless of their location. This is available in Attachment 2.

Figure 26 compares the employers which saw a decrease in SOV trips based on location. As shown, more employers located within TPAs saw a reduction in SOV commute trips (13 employers compared to 8 employers). Additionally, the employers located within TPAs saw a greater reduction in SOV trips, compared to those outside of TPAs. Of employers located within TPAs who saw a reduction in SOV, the average reduction was approximately 21%. For employers located outside of TPAs who saw a reduction, the average reduction was approximately 5%.

Figure 26: SOV Reduction for Employers Within TPAs vs. Outside of TPAs



6. Conclusions and Recommendations

To recap findings from previous sections of the report, a review of national peer cities found that Seattle and Portland had the most comprehensive parking reform packages, which lead to the most quantifiable benefits, including reductions in single occupancy commute mode share. Additionally, it was found that when cities, such as Denver and Minneapolis, took less aggressive actions with their parking reductions, they realized only a minimal reduction or even an increase in single occupancy vehicle more share.

Locally, it was found that on average, participants in the SANDAG's iCommute program were able to realize reductions single occupancy vehicle mode share reductions when implementing TDM measures. The suite of TDM offerings which are part of the program is varied, they include policy changes, as well as improvements to on-site amenities. Finally, there is a host of supportive research and data which show that reducing parking requirements leads to reduced single occupancy vehicular use and GHG reductions, and therefore make similar recommendations.

Through multiple smart growth initiatives, the City of San Diego is committed to reducing GHG emissions, reducing traffic congestion and continuing to develop a world-class City. In combination, the City's CAP, General Plan City of Villages Strategy, Complete Communities, and reduced parking requirement efforts, work toward these goals. Therefore, after review of national peer city efforts, local TDM efforts, and supportive research on the topic, the recommendation for this project will be to eliminate the minimum development parking requirements, within TPAs, for approximately two-thirds of land use types within the City. The parking reductions will work in conjunction with required TDM/Active Transportation measures provided through the Complete Communities program. Tables 11 and 12, shown below, summarize the non-residential zones and use types in which the elimination of parking minimum requirements is recommended within TPAs.

As noted, Table 11 shows the recommended parking requirements by commercial zones. Commercial uses, as well as eating and drinking establishments within TPAs regardless of the zone, are supported by transit, walking, or biking trips, whereas most – but not all – industrial uses still require vehicle trips due to the nature of the work.

Table 12 displays the recommended changes for separately regulated uses. The separately regulated uses which are governed by parking requirements through state mandates (or other sources the City does not have jurisdiction over) or that are heavily car dependent due to the nature of their use, have not been recommended for a reduction in parking requirements. Separately regulated uses which can be supported by transit, walking or bicycling trips when located in TPAs, are recommended for zero minimum parking requirements.

In addition, the project recommendation also includes zero minimum parking requirements for neighborhood serving commercial land uses citywide. 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". These uses provide services to neighboring residential areas and are specifically oriented for pedestrians lending themselves to access by walking and biking

Table 11: Recommended Parking Requirements for Commercial Zone in TPAs

Zone	Itemized Zones	Retail Sales, Commercial Services, Offices & Mixed-Use Proposed Required Parking	Eating and Drinking Proposed Required Parking
	Commercial Zones		
Community Commercial	CC-1-1, CC-2-1, CC-4-1, CC-5-1, CC-1-2, CC-2-2, CC-4-2, CC-5-2, CC-1-3, CC-2-3, CC-4-3, CC-5-3, CC-2-4, CC-3-4, CC-4-4, CC-5-4, CC-3-5, CC-4-5, CC-2-5, CC-5-5, CC-3-6, CC-4-6, CC-5-6, CC-3-7, CC-3-8, CC-3-9	Zero	Zero
Commercial Neighborhood	CN-1-1, CN-1-2, CN1-3, CN-1-4, CN-1-5, CN-1-6,	Zero	Zero
Commercial Regional	CR-1-1, CR-2-1	Zero	Zero
Commercial Office	CO-1-1, CO-1-2, CO-2-1, CO-2-2, CO-3-1, CO-3-2, CO-3-3	Zero	Zero
Commercial Visitor	CV-1-1, CV-1-2	Zero	Zero
	Industrial Zones		
Industrial Heavy	IH-1-1, IH-2-1	No Change	No Change
Industrial Light	IL-1-1, IL-2-1	No Change	No Change
	IL-3-1	Zero	Zero
Industrial Park	IP-1-1, IP-2-1	Zero	Zero
Industrial Small Lot	IS-1-1	Zero	Zero
International Business and Trade Zone	IBT-1-1	Zero	Zero
	Mixed-Use Zones		
Residential Mixed-Use	RMX-1, RMX-2, RMX-3	Zero	Zero
Employment Mixed-Use	EMX-1, EMX-2, EMX-3	Zero	Zero
Planned Districts	See Table 142-05E&F	Zero	Zero

Table 12: Recommended Parking Requirements for Separately Regulated Uses in TPAs

Uses	Proposed Required Parking
Institutional	
Separately Regulated Uses	
Botanical Gardens and Arboretums	Zero
Educational Facilities	No Change
Exhibit Halls & Convention Facilities	No Change
Hospitals	No Change
Intermediate care facilities and nursing facilities	No Change
Interpretive Centers	No Change
Museums	No Change
Radio & Television Broadcasting	No Change
Public Assembly & entertainment	
Theaters	Zero
Health Clubs	Zero
Swimming Pools	Zero
All Other Assembly and Entertainment	No Change
Visitor Accommodations	Zero
Separately Regulated Uses	
Child Care Centers	No Change
Funeral parlors & Mortuaries	No Change
Private clubs, lodges, fraternal organizations (except fraternities and sororities)	Zero
SRO's	Zero
Veterinary clinics & hospitals	No Change
Offices	
Business& professional/Government Regional & Corporate headquarters (except in IS Zone)	Zero
Medical, dental, & health practitioners (except in IS Zone)	Zero
All Office Uses in the IS	Zero
Vehicle & Vehicular Equipment Sales & Service	
Automobile service stations	No Change
Vehicle repair &	No Change

Table 12: Recommended Parking Requirements for Separately Regulated Uses in TPAs

Uses	**Proposed Required Parking**
maintenance	
Vehicle sales & rentals	No Change
Parking Ratios for Specified Non-Residential Uses	
Uses	**Proposed Required Parking**
Distribution and Storage	
All distribution and storage uses	Zero
Self-Storage Facilities	Zero
Industrial	
Heavy Manufacturing (except in IS Zone)	No Change
Light manufacturing (except in IS Zone)	No Change
Research and Development (except in IS Zone)	Zero
All industrial uses in the IS Zone	Zero