

MEMORANDUM

To: Joe Balbas
Balbas Construction

Date: April 25, 2025

From: John A. Boarman, PE & Román Lopez, PTP LLG Ref: 3-21-3385
LLG, Engineers

Subject: Parking Demand Evaluation for the York Drive Active Senior Living Project (PDS2021-MPA-001)

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Linscott, Law & Greenspan, Engineers (LLG) has prepared this memo to summarize our evaluation of the parking requirements and parking demand for the York Drive Active Senior Living Project, located southeast of York Drive and S. Santa Fe Avenue in the North County Metropolitan Subregional Plan area of San Diego County.

The project proposes to provide less parking than typically required by County of San Diego ordinance. California Assembly Bill 2097 (AB 2097), signed in September 2022, prohibits public agencies from imposing minimum automobile requirements on development projects within ½ mile of a major transit stop. These areas have been defined as Transit Priority Areas (TPA) under the California Public Resources Code.

AB 2097 is designed to promote sustainable development and transportation choices; however, developers still need to assess parking needs for the new development. Accordingly, this memo will briefly describe the Project, its proposed features, setting, and context, and provide a simple quantification of the factors that will reduce the project's parking demand to demonstrate that the proposed parking supply would not be exceeded.

PROJECT DESCRIPTION

The project would construct one four-story building of 138,139 square feet with 183 senior apartment units which will be deed-restricted to ages 62 and above. The apartments will include 121 studios, 51 one-bedroom units, and 11 two-bedroom units. The project will require a deed-restriction and agreement that will ensure the on-site units will be defined as a 100% senior development.

PROJECT LOCATION & CONTEXT

The project site is located near alternative transportation that would support the ability of residents to reduce vehicle ownership.

The Inland Rail Trail, a Class I bikeway, is immediately adjacent to the project site, parallel to S. Santa Fe Avenue and the North County Transit District (NCTD) rail right-of-way. The Inland Rail Trail currently extends from the city of Escondido to the cities of San Marcos and Vista and will ultimately span 21 miles through the city of Oceanside. Phase 2 adjacent to the site was completed in 2021. Construction on Phase 3, a one-mile segment from Mar Vista Drive to Civic Center Drive, began in June 2024.

The project site is also immediately adjacent to bus service provided by North County Transit District (NCTD) routes 305 and 332 with stops located at the intersection of

York Drive / S. Santa Fe Avenue. Both routes provide hourly service Monday-Friday and Route 332 also operates on Saturdays, although neither route currently operates on Sundays.

Light rail service is provided at the Buena Creek SPRINTER Station, which is less than ½ mile from the site. Rail service is every 30 minutes, 7 days a week.

On-street parking is generally not provided in the project area. York Drive is an unclassified two-lane undivided roadway with narrow shoulders that does not provide curbside parking. S. Santa Fe Avenue is a 4.1A Major Road with 3-4 vehicular travel lanes in the project area. On-street parking is also prohibited on S. Santa Fe Avenue.

PROJECT FEATURES

The project also includes many features and amenities designed to allow residents to enjoy themselves and take care of daily necessities without needing to leave the site. These include a beauty salon, chapel, library, arts and crafts rooms, cards and game rooms, movie theater, dining and entertainment room, fitness and wellness center, and a community business center. Commercial laundry service will be provided as well as tenant laundry on each floor.

Outdoor amenities will include a pool and spa area, outdoor barbeque area, putting green, bocce ball, walking trails, and community vegetable gardens and fruit trees.

Additionally, the Project is enhancing transit accessibility by providing a sidewalk along York Drive, repainting the existing crosswalk at the intersection of York Drive / S. Santa Fe Avenue, and replacing the existing bench at the bus stop adjacent to the Project site with a shelter consistent with NCTD standards.

Finally, the project will provide a shuttle service to local destinations. The shuttle service would tentatively run at three scheduled times each day.

PARKING REQUIREMENTS

The County of San Diego off-street parking requirements per Section 6370, for eligible developments participating in the density bonus program, require the project to provide parking at a rate 1 parking space per studio and 1-bedroom unit and 2 spaces per 2-bedroom unit. Based on the mix of units in the project description, this results in a total parking requirement of 194 stalls.

The project proposes to provide 160 spaces, or 34 fewer spaces than what would typically be required for a comparable development outside of a TPA.

PARKING DEMAND ANALYSIS

As described in this memo, the project's inherent features including 100% age-restricted units, its location near both high-quality transit and high-quality bike facilities, and extensive proposed features to provide services and amenities on-site would all contribute to reduced parking demand.

Although households aged 62 and older tend to make fewer vehicle trips and own fewer vehicles than the population at large, reduced parking for senior housing is considered in the parking requirements per the provisions of Section 6370. Therefore, this parking analysis focuses on the following:

- Proximity to Transit
- Parking Management Policies & Programs

While Project features including the on-site amenities and shuttle services described previously in this memo are not directly quantified, they would clearly support reduced trip-making and vehicle ownership by residents.

Proximity to Transit

The Project is located in a TPA within ½ mile of the Buena Creek Sprinter Station, a major transit stop. Additionally, there is bus service provided by NCTD Route 305 with stops located adjacent to the Project site at S. Santa Fe Avenue / York Drive / Woodland Drive. The Project is improving the bus stop adjacent to the Project site.

The ITE *Parking Generation Manual* (6th Edition) provides parking generation rates for low-rise multi-family housing (market rate, not age-restricted) by setting including “No Nearby Rail Transit” and “Less Than ½ Mile to Rail Transit”. Peak period parking demand at multi-family housing proximate to rail transit is shown to be on average 16.1% lower as compared to similar housing with no proximate rail transit. The relevant excerpts from the Parking Generation Manual are provided in ***Attachment A***

The project's proximity to transit is also supported by its proximity to high quality bike infrastructure, and its own shuttle service for residents.

To be conservative and account for the fact that not all seniors may be able to take advantage of active transportation options, a 10% parking demand reduction factor is assumed for this category.

Parking Management

The project will also prepare a parking management plan (PMP). The primary feature of the PMP will be unbundling residential parking costs. By charging directly for parking instead of passing on the cost through the cost of the unit, this measure can offer an incentive to reduce vehicle ownership and thereby parking demand. This policy also has positive equity implications as it allows individuals who do not own vehicles to avoid paying for the costs of constructing and maintaining parking.

This policy is supported by the project's proximity to transit and bike facilities providing for alternative transportation for those who choose to forgo vehicle ownership. The policy is also made effective by the lack of on-street parking in the area; residents would not be able to park on-street to avoid paying for an on-site parking space.

According to CAPCOA (*Quantifying Greenhouse Gas Reduction Measures*, October 2024) this measure has a range of effectiveness in reducing VMT up to 15.7% (see CAPCOA report excerpt in *Attachment B*). CAPCOA calculations assume a 0.4% decrease in vehicle ownership occurs for every 1% increase in total vehicle costs. For the purposes of this analysis, a 10% reduction in vehicle ownership was assumed.

Calculation

Like the CAPCOA guidance for calculation of VMT reductions, the combination of several parking demand reduction factors, and the independence of each factor are both complicated. Therefore, the quantified parking demand factors are combined multiplicatively to calculate the total reduction, in the form below. This accounts for the fact that same strategies may be redundant and applicable the same populations and minimizes the possibility of overstating the effectiveness of reductions. However, the effectiveness of some strategies may also increase when combined, which would make this approach conservative.

$$\text{Total Parking Reduction} = 1 - [(1-A) \times (1-B) \times (1-C) \dots]$$

Where:

A, B, C... = Individual parking demand reduction percentages

The calculated reduction for the project is as follows:

$$1 - [(1-10\%) \times (1-10\%)] = 19\%$$

A reduction of 19% applied to baseline requirement of 194 parking spaces equates to an expected parking demand of 157 spaces.

CONCLUSIONS

Pursuant to AB 2097, as the Project is located within ½ mile of a major transit stop it is not subject to minimum parking requirements. However, the analysis presented in this memo was prepared to assist in ensuring that adequate parking is provided for the specific needs of the proposed Project.

As shown in this memo, the anticipated parking need is estimated to be 157 spaces. This is less than the proposed parking supply of 160 spaces. Therefore, the proposed parking supply will be adequate to serve project parking demand.

cc: County of San Diego
File

ATTACHMENT A
ITE *PARKING GENERATION MANUAL* EXCERPTS

Multifamily Housing - 1 BR (Low-Rise) Not Close to Rail Transit (217)

Peak Period Parking Demand vs: Dwelling Units

On a: Weekday (Monday - Friday)

Setting/Location: General Urban/Suburban

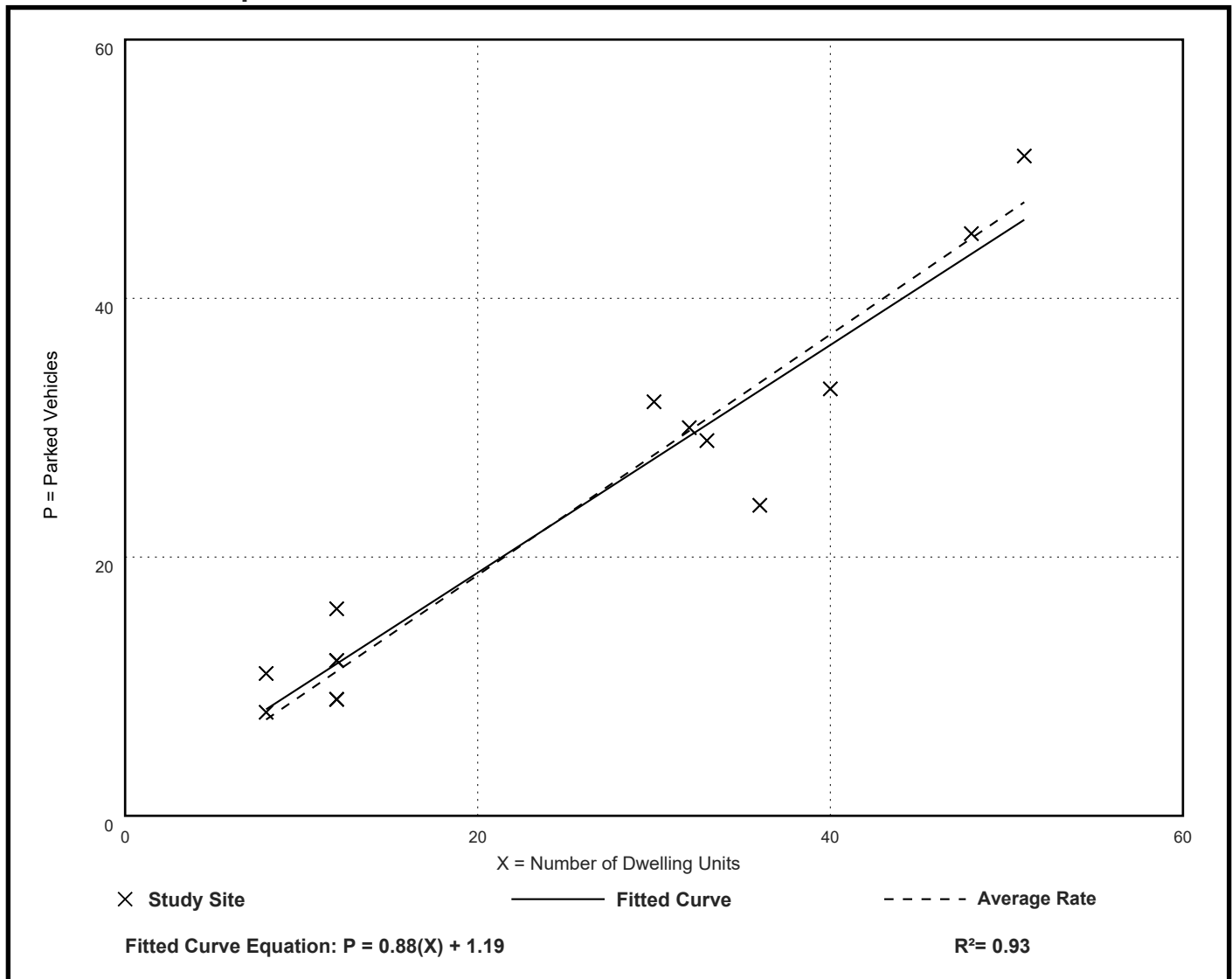
Number of Studies: 14

Avg. Num. of Dwelling Units: 25

Peak Period Parking Demand per Dwelling Unit

Average Rate	Range of Rates	33rd / 85th Percentile	95% Confidence Interval	Standard Deviation (Coeff. of Variation)
0.93	0.67 - 1.38	0.88 / 1.27	***	0.16 (17%)

Data Plot and Equation



Multifamily Housing - 1 BR (Low-Rise) Close to Rail Transit (217)

Peak Period Parking Demand vs: Dwelling Units

On a: Weekday (Monday - Friday)

Setting/Location: General Urban/Suburban

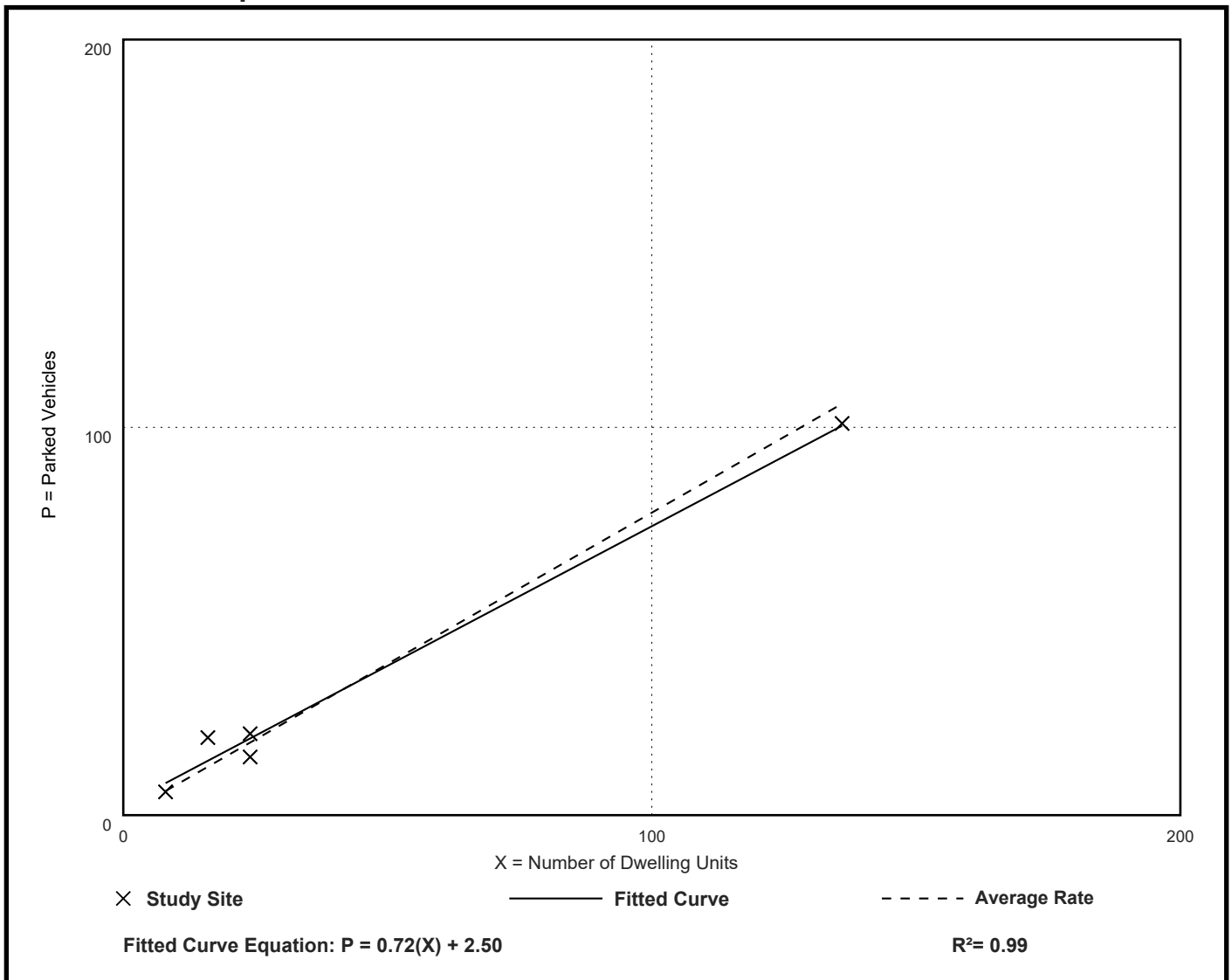
Number of Studies: 5

Avg. Num. of Dwelling Units: 42

Peak Period Parking Demand per Dwelling Unit

Average Rate	Range of Rates	33rd / 85th Percentile	95% Confidence Interval	Standard Deviation (Coeff. of Variation)
0.78	0.63 - 1.25	0.74 / 1.25	***	0.16 (21%)

Data Plot and Equation



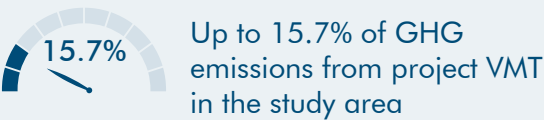
ATTACHMENT B

CAPCOA QUANTIFYING GREENHOUSE GAS REDUCTION MEASURES EXCERPTS

T-16. Unbundle Residential Parking Costs from Property Cost



GHG Mitigation Potential



Co-Benefits (icon key on pg. 34)



Climate Resilience

Unbundling residential parking costs from property costs could incentivize increased use of public transit and thus result in less traffic, potentially reducing congestion or delays on major roads during peak AM and PM traffic periods. When this reduction occurs during extreme weather events, it better allows emergency responders to access a hazard site.

Health and Equity Considerations

The unbundling of parking costs would help decrease housing costs for individuals who do not own personal vehicles.

Measure Description

This measure will unbundle, or separate, a residential project’s parking costs from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost. On the assumption that parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces, this measure results in decreased vehicle ownership and, therefore, a reduction in VMT and GHG emissions. Unbundling may not be available to all residential developments, depending on funding sources.

Subsector

Parking or Road Pricing/Management

Locational Context

Urban, suburban

Scale of Application

Project/Site

Implementation Requirements

Parking costs must be passed through to the vehicle owners/drivers utilizing the parking spaces for this measure to result in decreased vehicle ownership.

Cost Considerations

Unbundling residential parking costs from property costs may decrease revenue for property owners. This loss may be partially offset by reduced costs needed to maintain parking facilities with less car occupancy and the potential for non-resident parking as a supplementary income stream. For residents, reduced fees and the ability to go without owning a car is a major cost benefit. Municipalities also benefit from a reduction of cars on the road, which can lead to lower infrastructure and roadway maintenance costs.

Expanded Mitigation Options

Pair with Measure T-19-A or T-19-B to ensure that residents who eliminate their vehicle and shift to a bicycle can safely access the area’s bikeway network.





GHG Reduction Formula

$$A = \frac{B}{C} \times D \times E$$

GHG Calculation Variables

ID	Variable	Value	Unit	Source
Output				
A	Percent reduction in GHG emissions from project VMT in study area	0–15.7	%	calculated
User Inputs				
B	Annual parking cost per space	[]	\$ per year	user input
Constants, Assumptions, and Available Defaults				
C	Average annual vehicle cost	\$9,282	\$ per year	AAA 2019
D	Elasticity of vehicle ownership with respect to total vehicle cost	-0.4	unitless	Litman 2020
E	Adjustment factor from vehicle ownership to VMT	1.01	unitless	FHWA 2017

Further explanation of key variables:

- (B) – For most projects, this represents a monthly parking fee multiplied by 12. For deeded parking spaces, an estimate of the additional cost to a mortgage may be used, or the total cost may be prorated over 30 years. Costs to park will vary widely based on location; however, this value should consider if other nearby offsite parking options are available at lower cost. See Table T-16.1 in Appendix C for examples of monthly parking prices for different facility types.
- (C) – The average vehicle cost per year in 2019 was \$9,282, based on a car driven 15,000 miles per year. Costs include gasoline, maintenance, insurance, license and registration, loan finance charges, and depreciation but do not include parking (AAA 2019).
- (D) – A synthesis of literature reported that, on the low end, a 0.4 percent decrease in vehicle ownership occurs for every 1 percent increase in total vehicle costs (Litman 2020).
- (E) – The adjustment factor from vehicle ownership to VMT is based on the following (FHWA 2017):
 - The average Californian household with 1 vehicle drives 11,117 miles per vehicle while households with 2 vehicles drives 11,223 miles per vehicle.
 - The reduction of 1 vehicle from a 2-vehicle household leads to a 0.94 percent decrease in VMT per vehicle.
 - So, $E = 1 - \left(\frac{11,117 \frac{\text{miles}}{\text{vehicle}} - 11,223 \frac{\text{miles}}{\text{vehicle}}}{11,223 \frac{\text{miles}}{\text{vehicle}}} \right) = 1.01$



GHG Calculation Caps or Maximums

Measure Maximum

(A_{\max}) The GHG reduction from unbundled parking is capped at 15.7 percent, which is based on the use of (B_{\max}) in the GHG reduction formula.

(B_{\max}) The annual cost of parking space is capped at \$3,600, or \$300 per month. At monthly costs above \$300, the cost of parking represents more than a 30 percent increase in total vehicle cost. In addition, this reflects the upper maximum of observed parking prices outside of extremely dense downtown areas (such as San Francisco's SOMA neighborhood).

Subsector Maximum

($\sum A_{\max T-14 \text{ through } T-16} \leq 35\%$) This measure is in the Parking or Road Pricing/Management subsector. This subcategory includes Measures T-14 through T-16. The VMT reduction from the combined implementation of all measures within this subsector is capped at 35 percent.

Example GHG Reduction Quantification

The user reduces VMT by unbundling the parking costs from property costs of a project, discouraging vehicle ownership, and therefore reducing VMT. In this example, the annual parking cost per space is \$1,800 (B), which would reduce GHG emissions from project study area VMT (as compared to the same project with bundled parking costs) by 7.8 percent.

$$A = \left(\frac{\$1,800}{\$9,282} \right) \times -0.4 \times 1.01 = -7.8\%$$

Quantified Co-Benefits



Improved Local Air Quality

The percent reduction in GHG emissions (A) would be the same as the percent reduction in NO_x, CO, NO₂, SO₂, and PM. Reductions in ROG emissions can be calculated by multiplying the percent reduction in GHG emissions (A) by an adjustment factor of 87 percent. See *Adjusting VMT Reductions to Emission Reductions* above for further discussion.



Energy and Fuel Savings

The percent reduction in vehicle fuel consumption would be the same as the percent reduction in GHG emissions (A).



VMT Reductions

The percent reduction in VMT would be the same as the percent reduction in GHG emissions (A).



Sources

- AAA. 2019. *Your Driving Costs*. September. Available: <https://exchange.aaa.com/wp-content/uploads/2019/09/AAA-Your-Driving-Costs-2019.pdf>. Accessed: January 2021.
- Federal Highway Administration (FHWA). 2017. *National Household Travel Survey – 2017 Table Designer*. Annual VMT / Vehicle by Count of Household Vehicles in California. Available: <https://nhts.ornl.gov/>. Accessed: March 2021.
- Litman, T. 2020. *Parking Requirement Impacts on Housing Affordability*. June. Available: <https://www.vtpi.org/park-hou.pdf>. Accessed: January 2021.