



White Paper on Parking Maximums

Prepared by W-Trans for the City of San Carlos
August 15, 2025

Executive Summary

The City Council expressed concerns about parking maximums when they were last presented at the Council meeting of June 23, 2025. The discussion of maximums will be continued on August 25, 2025.

In addition, the Council requested more information about the Metropolitan Transportation Commission’s (MTC) Transit Oriented Communities (TOC) policy and how it influences eligibility for One Bay Area Grant (OBAG) funds; the Council further requested the dollar amount of past OBAG funds San Carlos has received. More information about MTC’s TOC policy is provided on pages 8-10. To date, San Carlos has been awarded approximately **\$3.5 million** in OBAG funding. This includes approximately \$2.7 million for such transportation-related projects as pavement rehabilitation on Crestview Drive and pedestrian enhancements at the intersections of Arroyo and Cedar and Hemlock and Orange. More recently, San Carlos received \$300,000 via OBAG 3 to support the planning for the Downtown Streetscape Master Plan and \$500,000 to fund installation of electric vehicle chargers.

This white paper defines parking maximums, describes their benefits and drawbacks as a Transportation Demand Management (TDM) tool, and discusses how they can help the City remain eligible for One Bay Area Grant (OBAG) funding. The current proposed maximums are provided in Table 1 and would generally apply to developments within a half mile of major transit stops along the El Camino Real corridor. “Soft” (Tier 1) and “firm” (Tier 2) maximums would be implemented.

Tier 1 maximums would be available by right with Tier 2 maximums offered for added flexibility if applicants:

1. Make at least 25 percent of on-site parking publicly accessible during business hours for non-residential uses or daytime hours (9 a.m. to 6 p.m.) for residential uses;
2. Provide supplemental TDM measures *in addition* to those required in the TDM ordinance; or
3. Pay an in-lieu or off-set fee to the City to offset the impacts of building additional parking.

Table 1 – Proposed Vehicle Parking Maximums Near Transit

Land Use	Tier 1	Tier 2	District-Wide Maximums
Multi-Family Residential	0.7 spaces/bedroom	0.8 spaces/bedroom	1 space/unit*
Non-Residential	2.0 spaces/1,000 sf	2.5 spaces/1,000 sf	2.5 spaces/1,000 sf

Notes: All requirements represent parking maximums; sf = square feet; 1 space/unit is approximately equivalent to 0.6 space/bedroom; Previous hotel maximum eliminated (MTC also confirms that it is not required).

The proposed maximums also include “district-wide maximums” to comply with the Metropolitan Transportation Commission (MTC) Transit-Oriented Communities (TOC) policy. District-wide maximums are described in the “District-Wide Caps on Parking” section near the end of the paper.

The City could also enact other maximum parking standards that would put the City into at least *partial* compliance. It is noted that MTC's scoring for partial compliance with TOC policies has not yet been fully decided.

The following are alternative standards to consider:

- Eliminate residential maximums and maintain a parking maximum of 2.5 spaces per 1,000 square feet for commercial development. Only one commercial development approved and/or built since 2019 exceeded this ratio (by a single parking space). This would result in partial compliance with TOC policy, as the commercial maximum would remain compliant.
- Raise residential and commercial maximums to meet current market demands, with or without a district cap. The residential maximum would be 0.9 spaces per bedroom and commercial maximum would be 2.5 spaces per 1,000 square feet. All residential developments approved and/or built since 2019 have been at or below this maximum with only one commercial development exceeding this ratio (as noted above). These standards would bring the City in full compliance with TOC policy with district-wide caps on parking and partial compliance without district-wide caps.
- Increase residential maximums to 0.8 spaces per bedroom (Tier 1) and 0.9 spaces per bedroom (Tier 2) and decrease commercial maximums to 1.5 spaces per 1,000 square feet (Tier 1) and 2.0 spaces per 1,000 square feet (Tier 2). This would result in full compliance with TOC policy if paired with district-wide caps on parking.

What are parking maximums?

Parking maximums are caps on the number of new vehicle parking spaces that can be provided by new developments. For example, a maximum of two spaces per 1,000 commercial square feet would prevent a 20,000 square foot retail and office development from supplying more than 40 parking spaces on site (although it does not prevent a development from leasing other available off-site parking). While parking minimums have routinely been used in the past, governments have increasingly recognized the need to limit parking and establish parking maximums in their regulations.¹ For example, Alameda, CA, noted their reasons for establishing maximums:

A maximum standard is proposed because the City seeks to avoid too much off-street parking provided on any given site due to the impacts of large parking areas on the environment, the transportation system, and the cost of development in Alameda, which has limited land resources.²

Similarly, Emeryville, CA, which has adopted parking maximums, explains in their municipal code that the purposes of off-street parking and loading requirements include:

- (b) Avoid the negative impacts associated with spillover parking into adjacent neighborhoods, and minimize the negative environmental and urban design impacts that can result from parking lots, driveways, and drive aisles within parking lots; ...
- (f) Reduce urban stormwater runoff and heat island effect.³

Parking maximums typically apply to new developments only and do not result in the removal of existing vehicle parking spaces.

Where have parking maximums been applied?

Table 2 summarizes local Bay Area examples of cities that have adopted parking maximums. The maximum parking ratios for common land use types are provided. Most of the parking maximums were implemented recently (i.e. within the last five to ten years), so research on their long-term impacts in the context of the Bay Area has not yet been completed.

Table 2 – Examples of Adopted Parking Maximums

City	Scope	Maximum Ratio		
		Multifamily Residential	Office	Retail
Alameda ⁴	Citywide	1 space/unit in select <u>zones</u> ; else 1.5 spaces/unit	2.5 spaces/ksf	3 spaces/ksf
Fremont ⁵	Downtown and City Center Districts	1 space/unit in transit <u>area</u> ; else 2 spaces/unit	3.3 spaces/ksf in transit area; else 5 spaces/ksf	
Hayward ⁶	Mission Boulevard Area	1 space/unit within ½ mile of <u>BART</u> ; else 2 spaces/unit	N/A	N/A
East Palo Alto ⁷	Ravenswood Business District	1 space/1-bed unit; 1.5 spaces/2-bed <u>unit</u> ; 2 spaces/3-bed unit	3.0 spaces/ksf	3.5-4.0 spaces/ksf
Mountain View ⁸	North Bayshore Area	0.5 spaces/1-bed <u>unit</u> ; 1.0 spaces/2+ bed unit	2.7 spaces/ksf	Use demand from ITE
Sunnyvale ⁹	Citywide	N/A	4 spaces/ksf	5 spaces/ksf

Notes: ksf = 1,000 square feet; ITE = Institute of Transportation Engineers

What are the tradeoffs associated with parking maximums?

Benefit – Housing Affordability

When housing developments do not provide excess vehicle parking, they are more affordable. For residential uses, each additional off-street vehicle parking space translates to a cost of about \$800 to \$1,200 per year for the developer in a typical urban environment.⁴ Reducing the amount of surface parking allows more housing units to fit onto a single parcel, which can also lower housing costs by increasing the housing supply. Figure 1 visualizes how parking contributes to the cost of housing.

Even when parking costs are “unbundled,” or separated from the rental or purchase price of housing, residents without private vehicles can still take on the costs of parking when they elect not to pay for a parking space. An analysis of 23 newer multifamily housing developments in the Seattle area showed that none of the developments recovered enough parking fees to cover the comprehensive costs of providing on-site parking.⁵ Landlords make up losses through increased apartment rents, which results in car-free renters paying a substantial hidden fee for parking as part of their rents.⁵ Parking maximums limit excess vehicle parking, which would reduce the hidden “parking fee” added to rent and result in lower rents for residents with or without vehicles.



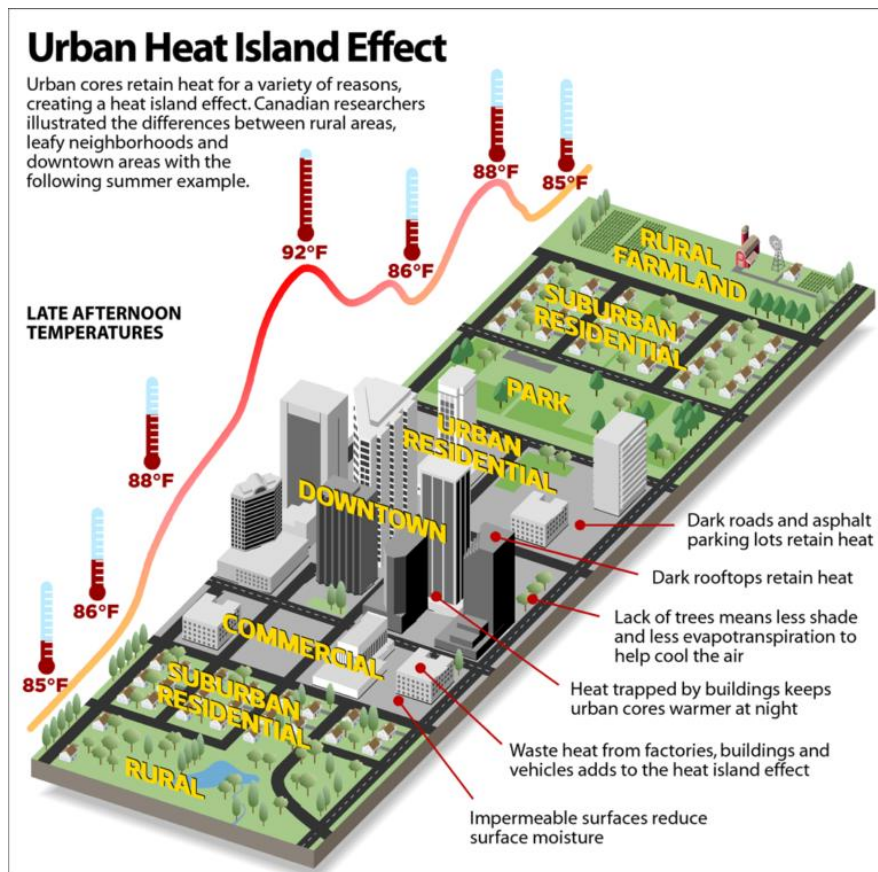
Figure 1 Example of Parking’s Contribution to Apartment Costs (Source: [Reinventing Parking](#), Parking Reform Network)

Benefit – Stormwater Runoff

Impervious off-street parking lots prevent groundwater infiltration and increase the amount of stormwater runoff.¹ The stormwater runoff from parking lots tends to be toxic, which can harm aquatic life when it is released into urban creeks and rivers.⁶ According to the National Oceanic and Atmospheric Administration (NOAA), sprawling low-density development with more impervious surfaces intensifies demand on stormwater infrastructure, which can cause flooding when a stormwater management system is overwhelmed.⁷ Parking maximums reduce the size of paved off-street parking facilities and, in turn, results in a lower risk of flooding and less polluted runoff. This helps support Strategy 45 of the City's *Climate Mitigation and Adaptation Plan (CMAP)* to "reduce flooding and ponded water in the city by collaborating with local and regional flood-protection agencies."⁸

Benefit – Urban Heat Island

Strategy 37 of the CMAP is to "minimize the urban heat island effect."⁸ Heat islands are defined in the CMAP as urban areas that experience higher temperatures due to more impervious surfaces that absorb and re-emit the sun's heat. Parking maximums can prevent developers from creating excessively large surface parking lots, which limits the amount of new paved surfaces that contribute to the urban heat island effect.



SOURCE: D.S. Lemmen and F.J. Warren, *Climate Change Impacts and Adaptation*

PAUL HORN / InsideClimate News

Figure 2 Visualization of Urban Heat Island (Source: Earth.org)

Benefit – Traffic and Greenhouse Gas Reduction

Goal 4 of the City’s CMAP is to “promote sustainable development that reduces vehicle miles traveled,” and the CMAP notes that “private vehicle travel releases substantial volumes of GHGs [greenhouse gases], taxes roads, and poses health and safety concerns for the community.”⁸ The CMAP sets forth Strategy 17 to “reduce community-wide transportation-related emissions per resident and employee, with an emphasis on reductions from existing and new development in the city’s core commercial, office, and industrial areas, including development on the east side.”

In 2008, California Senate Bill (SB) 375 directed the California Air Resources Board to set targets for reducing greenhouse gas emissions (GHG).⁹ The resulting targets include reducing Vehicle Miles Traveled (VMT) by 25 percent by 2030 and 30 percent by 2045 to achieve carbon neutrality by 2045.¹⁰ To meet these targets, the California Air Resources Board recommends the following relevant priority local actions to reduce VMT:¹⁰

- Reduce or eliminate minimum parking standards or implement parking maximums in areas that are well-served by other mobility options.
- Require that new residential developments unbundle the cost of parking from the cost of renting or purchasing housing.
- Implement parking pricing or transportation demand management pricing strategies.

Parking maximums are an effective way to reduce VMT and GHG since less parking can result in less driving. In this sense, parking maximums can serve as a Transportation Demand Management (TDM) strategy and help reinforce the effectiveness of other TDM measures by reducing hidden and/or subsidized parking costs. For example, a study of residential lotteries in San Francisco showed that residents of buildings with at least one parking space per unit had more than twice the car ownership rate of residents of buildings with no parking.¹¹ Another study, published in Transportation Research Part A, found that parking availability at a workplace or at home significantly affects the probability of choosing car travel.¹² The authors note the benefits of parking maximums:

The policy-relevant implication of this is that maximum parking standards, at least in the long run, significantly reduce car use on journeys to work. By imposing (strict) maximum standards, cities can reduce congestion and pollution and also reduce the need for large investments in roadway capacity.¹²

To illustrate the effect of parking maximums on vehicle travel it was assumed that a one percent reduction in parking spaces translates to a one percent reduction in vehicle trips for residential uses. Based on vehicle parking data from residential developments in San Carlos between 2019 and 2024, the proposed “Tier 1” parking maximum of 0.7 spaces per bedroom would have resulted in 15 percent fewer new parking spaces, and the proposed “Tier 2” maximum of 0.8 spaces per bedroom would have resulted in 7 percent fewer spaces. By this logic, vehicle-related greenhouse gas (GHG) emissions from new residential development would be reduced by 15 percent with Tier 2 maximums and 7 percent by Tier 1 maximums.

GHG emissions in transportation are a large fraction of the emissions with new development, as Table 4 of the CMAP shows that 47 percent of annual GHG emissions in San Carlos are due to the transportation sector. It follows that cutting emissions from the transportation sector is one of the biggest tools that cities have available to meet GHG reduction targets, and parking maximums are an effective means to reduce transportation emissions. With a significant amount of new development expected in San Carlos, parking maximums could also help limit traffic impacts of the new development on already congested roadways by discouraging vehicle travel to/from new developments.

Benefit – Quality of Life

The City's *Climate Mitigation and Action Plan* includes goals and strategies to encourage walking, bicycling, and public transportation.⁸

- Under Goal 4, the CMAP states that “diversifying the safe, affordable, accessible, and reliable transportation options available to the San Carlos community ensures that all residents are able to participate in public life and gives all community members the freedom to choose transportation modes that promote health, reduce gasoline costs and time lost in traffic, and help the City meet its climate action goals.”
- Goal 5 of the CMAP is to “transition to low-carbon transportation.”
- Strategy 12 of the CMAP relates to Active Transportation: “Prioritize bicycling and walking as safe, practical, and attractive travel options citywide, as directed by the Bicycle and Pedestrian Master Plan.”

The San Carlos *Bicycle and Pedestrian Master Plan* explains the benefits of a safe and comfortable environment for walking and bicycling:¹³

- Improve access to outdoor amenities and increase recreational opportunities
- Reduce the risk of bicycle and pedestrian involved collisions and injuries
- Provide affordable transportation options for low-income and disadvantaged residents
- Increase a city's livability and quality of life
- Decrease visual and noise pollution caused by automobiles
- Reduce greenhouse gas emissions into the atmosphere

As described in the City's planning documents, active forms of transportation like walking and bicycling benefit a person's health and quality of life, while increased vehicle travel can negatively impact quality of life through time lost in traffic, pollution (air, noise, and visual), and increased costs from owning and operating a vehicle. Worldwide studies have shown that the health benefits from walking and bicycling far outweigh the health risks from exposure to traffic incidents and air pollution.¹⁴ Per the previous section, parking maximums lead to reduced vehicle travel, which in turn is associated with an increase in travel by public transportation and active forms of transportation.

As an example of how parking maximums can impact travel behavior, developers in transit-rich areas of San Carlos would be discouraged from providing two vehicle spaces for each two-bedroom unit with a parking maximum of 0.8 spaces per bedroom. With one parking space available for a unit, households are incentivized to keep one vehicle rather than two, especially if they cannot store their vehicle on the street. Members of the household are encouraged to walk, bicycle, and take transit to make trips when the vehicle is in use. Even when a vehicle is available, many trips in transit-rich areas are made without driving. For example, a neighborhood like Downtown San Carlos would provide the highest opportunities to walk from a residential unit to a downtown business (e.g., grocery store, post office, restaurant, etc.) to meet every day needs or to Caltrain for commute trips. These areas near transit are the ideal geography for parking maximums, as people who *live* in Downtown may not need a vehicle for regular trip-making.

Benefit – Equity

Data from the 2022 National Household Travel Survey (NHTS) for the Pacific region shows that lower-income households own fewer vehicles. Figure 3 shows that the average number of vehicles per household increases with income, and the percentage of zero-vehicle households decreases with income. Households with incomes less than \$25,000 per year own less than one vehicle on average, and over 30 percent are

zero-vehicle households. In contrast, households with incomes greater than \$150,000 per year tend to own more than two vehicles, and only one percent of these households have zero vehicles.

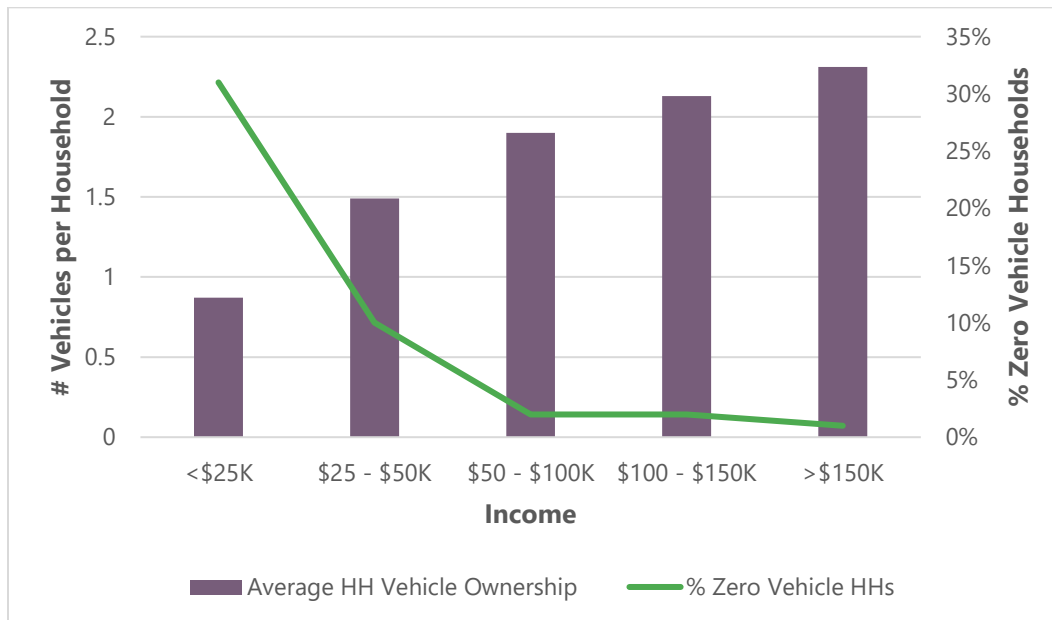


Figure 3 Average Number of Vehicles and % Zero Vehicle per Household by Income Group for Pacific Region (Source: 2022 NHTS)

Since lower-income households tend to own fewer vehicles, parking maximums tend to benefit lower-income households by making housing more affordable for those without cars. Due to lower parking ratios, there is a lower cost to construct housing units as discussed in the “Housing Affordability” section. Maximums also encourage a denser, less vehicle-dependent environment which benefits lower-income households with less vehicle ownership, frees up street space for other modes of transportation, and helps build an equitable urban environment that caters to all users. With less vehicle travel due to maximums, vehicle pollution and the risk of fatal traffic crashes are reduced; traffic fatalities and pollution from vehicles disproportionately impact low-income communities and communities of color.¹⁵

Drawback – Effects on Developers and Lenders

*Do Parking Maximums Deter Housing Development?*¹⁶ explores the idea that maximum parking standards may lead to a decline in housing development, as developers and lenders divert their investments into markets with more flexible parking standards. Using London, United Kingdom, as an example—which has had parking maximums since 2004 and has some of the most restrictive parking maximums among worldwide cities—the researchers found that more restrictive parking maximums in the inner neighborhoods increased housing supply, while more restrictive maximums in the peripheral neighborhoods reduced housing development. They also caution that applying maximums to only the city centers could cause lower-density areas to become more attractive to residents that value private parking, leading to a decline in development in city centers and increase in travel demand.

In the context of San Carlos, 11 of the 14 residential projects approved between 2019 and 2024 included 0.8 spaces per bedroom or less, which would be allowed under the proposed “Tier 2” parking maximum. The highest ratio of spaces provided was 0.9 spaces per bedroom, which is only slightly greater than the proposed maximum. Only one of 12 non-residential projects approved between 2019 and 2024 included more parking than the proposed non-residential “Tier 2” maximum of 2.5 spaces per 1,000 square feet; this project provided 2.51 spaces per 1,000 square feet. **This indicates that developers in San Carlos are already providing parking close to or under the proposed maximums, and the maximums would be less likely to drive away development.** The Alexandria project applicant recently agreed to a parking maximum of 2.0 spaces per 1,000 square feet which further supports that the market demand for parking

is generally within the parking maximums. Table 2 shows a summary of the development data between 2019 and 2024 from San Carlos.

Table 2 – San Carlos 2019-2024 Development Data

Type of Project	Multifamily Residential	Non-Residential
Number of sites	14	12
Total size	432 units	2,225 ksf
Minimum spaces supplied	0.35 spaces/bedroom	1.14 spaces/ksf
Average spaces supplied	0.73 spaces/bedroom	1.92 spaces/ksf
Proposed "Tier 2" maximum	0.80 spaces/bedroom	2.50 spaces/ksf
Number of sites exceeding the "Tier 2" maximum	3	1
Maximum spaces supplied	0.90 spaces/bedroom	2.51 spaces/ksf

Notes: ksf = 1,000 square feet

Drawback – On-Street Spillover Without Proper Management

With limited or priced off-street parking, many residents of new developments will choose to park on the street if parking is free and unrestricted. For example Portland, OR, experienced significant parking spillover when they removed minimum parking requirements without managing street parking.¹⁷ However, proper management of on-street parking can prevent spillover as an alternative to requiring off-street parking, especially since keeping off-street parking requirements leads to negative effects like increasing housing costs and subsidizing vehicle travel.¹⁸ A residential parking permit program allows established residents to park on street for a low price, while residents of new developments with limited parking would not have access to the permit program. These residents would have to pay for an off-street parking space or omit owning a vehicle, rather than parking on the street where there are permit restrictions.

Regional Policy

To achieve Plan Bay Area 2050 sustainability goals and improve livability throughout the region, the Metropolitan Transportation Commission (MTC) has developed a set of land use, transportation, and affordable housing policies it would like to see implemented in areas adjacent to transit. The Transit-Oriented Communities (TOC) approach would emphasize greater density, reduced automobile-dependency, and increased walkability in areas within a half mile of transit stations (BART, Caltrain, and SMART) and ferry terminals. MTC has classified the half-mile radius surrounding the San Carlos Caltrain station as a TOC area, as shown in Figure 4.

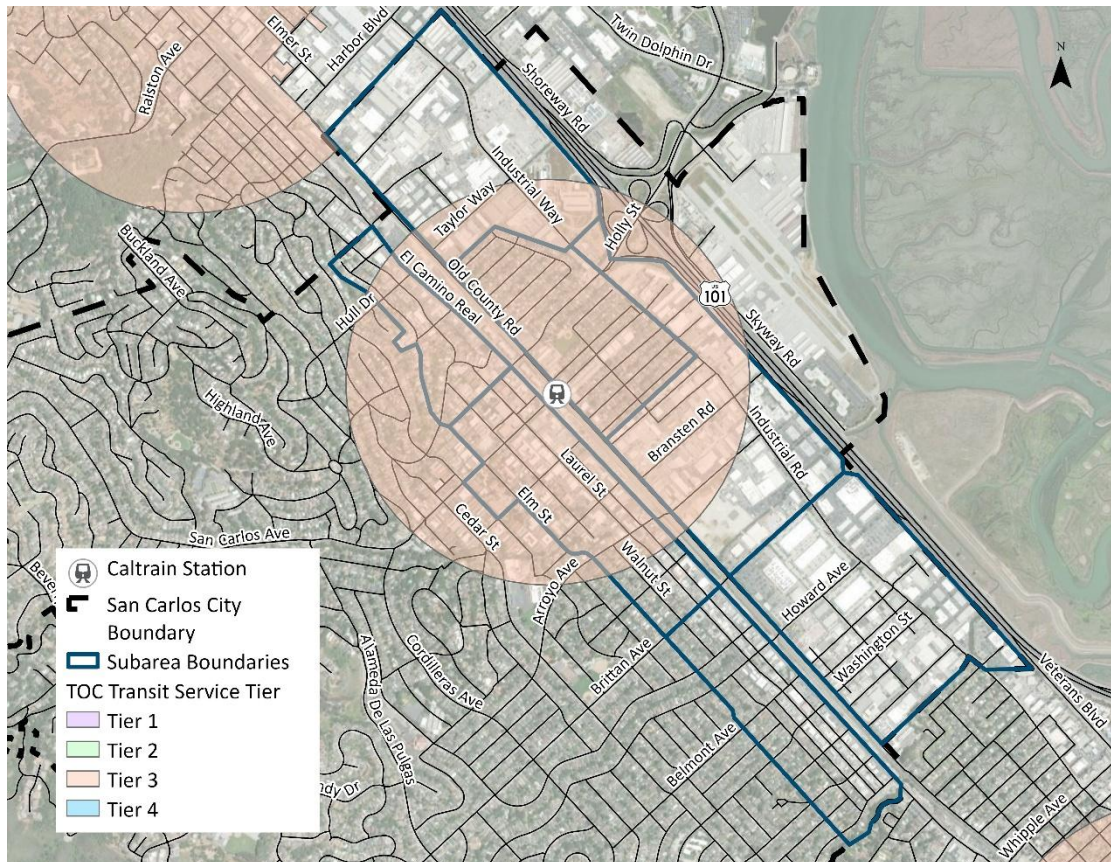


Figure 4 MTC TOC Area Boundaries

To encourage adoption of TOC policies, MTC has indicated TOC-compliant jurisdictions will be prioritized for funding through the One Bay Area Grant (OBAG) program. OBAG is a means of distributing federal transportation funds to local jurisdictions. As such, OBAG funds must be used for specific transportation improvements. Since OBAG was first introduced in the early 2010s, San Carlos has been awarded approximately \$3.5 million for such projects as pavement rehabilitation on Crestview Drive and pedestrian enhancements at the intersections of Arroyo and Cedar and Hemlock and Orange. More recently, San Carlos received \$300,000 via OBAG to support the planning for the Downtown Streetscape Master Plan and \$500,000 for electric vehicle charging stations in and around Downtown.

At the time this document was compiled, MTC was still determining how local jurisdictions would be evaluated for compliance with TOC policy as well as the extent to which OBAG funding requests would be prioritized. In spring 2025, MTC issued a draft scoring matrix for determining TOC compliance which assigns 25 points to parking policies, 25 points to density policies, 25 points to affordable housing policies, and the final 25 points to station access and circulation policies. Jurisdictions with 85 points and above would be deemed in “substantial compliance” with TOC policy and would have access to a special set-aside of OBAG funds. Jurisdictions with 40-84 points would be deemed “partially compliant” with TOC policy and would receive a preference for OBAG funding. Jurisdictions with 39 points or fewer would not be compliant and would receive no OBAG preference.

MTC’s draft scoring matrix proposed 6 points for meeting the commercial parking maximum requirement and 6 points for meeting the residential parking maximum requirement, for a total of 12 points. Partial points may be awarded for maximum requirements that are higher, but within a certain range (e.g., 33 percent) of the policy target. Maximums represent 12 percent of the total number of points possible for TOC compliance. While there are areas where San Carlos can be expected to score well against the TOC criteria, there may be other proposed affordable housing and density policies that may be difficult to achieve in the local context. Given that San Carlos can only forego 15 points if it wishes to be competitive for the special

OBAG set-aside, it will be important to weigh the pros and cons of each strategy that could tip the scale between “substantial” and “partial” compliance.

District-Wide Caps on Parking

For San Carlos, within a half mile of the San Carlos Caltrain station, MTC’s policy requires that no minimum vehicle parking requirements apply to new developments (already accomplished through AB2097), a parking maximum of 1.0 space per unit or lower is set for residential developments, and a parking maximum of 2.5 spaces per 1,000 square feet or lower is set for commercial developments. MTC offers flexibility in complying with its policy. For example, the City can set district-wide maximums such that parking is limited for the entire district but has a higher cap on a site-by-site basis. The City can also set a residential maximum by bedroom rather than by unit, given that the “per bedroom” maximum is approximately equivalent to the “per unit” maximum.

With district-wide maximums based on the anticipated development from the 2045 General Plan buildout, including Downtown Specific Plan buildout, there would be up to **2,568 new private vehicle parking spaces allowed to be constructed in the Downtown**. The number of allowed spaces would change if the General Plan were adjusted to increase or decrease the projected growth. These district-wide maximums would be compliant with the TOC policy and earn the City all 12 available points for parking maximums. Since some developments can provide less parking than the maximum ratio, those projects with less parking free up available spaces within the district-wide limit for developments with more parking.

Developers may be able to use concessions from the State’s Density Bonus Law to be exempt from parking maximums; in this case, discussions with MTC have indicated that the additional parking would not contribute to the district-wide cap. With parking maximums, there is less potential for developers to divert their investments from San Carlos into surrounding communities with more flexible standards. Under the TOC Policy, other communities along Caltrain will also be incentivized to implement parking maximums to remain eligible for grant funding.¹⁹

Conclusions

- Parking maximums are becoming more commonly used in a variety of Bay Area jurisdictions. Those in TOC areas range from being lower and higher than those required by MTC, and other maximums are in place outside of TOC areas.
- Parking maximums can provide a variety of benefits including increasing housing affordability, reducing stormwater runoff and the urban heat island effect, increasing active transportation use, providing greater equity to lower income households, and reducing traffic and greenhouse gas emissions. Based on the currently proposed tiered parking maximums, vehicle trips and emissions would be reduced by seven to 15 percent for new developments.
- Parking maximums may produce certain disadvantages. They may discourage some housing developers who wish to provide more parking than the allowed maximums; historic development data in San Carlos shows that 21 percent of housing developments supplied more parking than the proposed maximums, although none provided *significantly* more than the proposed maximums and non-residential developments generally did not exceed the proposed maximums. Maximums may increase on-street parking spillover into surrounding areas if not addressed through parking management strategies such as parking permit programs.
- The MTC TOC policy draft scoring matrix places 25 percent of its scoring on parking policy, almost half of which (12 percent) is based on the adoption of parking maximums; partial points may be awarded for partial compliance. Flexibility within the policy (e.g., district caps) may help facilitate housing development for those desiring to supply more parking.

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 - ¹³ *Bicycle and Pedestrian Master Plan*, 2020, City of San Carlos
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 - ¹⁶ *Do Parking Maximums Deter Housing Development?* 2017, Fei Li & Zhan Guo, Journal of Planning Education and Research, <https://doi.org/10.1177/0739456X16688768>
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