

**SANTA CRUZ COUNTY PLANNING DEPARTMENT POLICY/ORDINANCE  
INTERPRETATION**

Interpretation No.: PL-01 (Parking Lots)  
Effective Date: 01/01/03  
Originally Issued: 05/12/95 (Peter Parkinson, Paving of parking lots)

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**Question**

*Is a development permit required to pave a parking lot for an existing legal use?*

**Applicable Ordinance Section(s)  
and/or General Plan/LUP Policy(ies)**

§13.10.140(a)  
§13.10.552(e)  
§13.10.554(a)4  
§<sup>a</sup>3.10.554(d)

**INTERPRETATION:**

**A development permit is not needed to pave a parking lot if the following circumstances apply: 1) the use the parking lot serves is an existing legal use, 2) the area proposed for parking has been regularly used for parking in the past, 3) there has been no increase in the area used for parking, and 4) there has been no change in the site circulation system. However, paving a parking lot triggers the requirement to meet the current accessibility regulations as required by Title 24 of the California Code of Regulations (California Building Standards).**

**Reason**

If there is an existing legal use that has an area that has been regularly used for parking and there is not expansion or intensification of the use, then Subsection 13.10.140(a) does not require a development permit for merely paving an existing parking area. This is limited solely to paving and does not include grading to create a parking lot where none existed previously. However, even if no development permit is required for paving a parking lot, current accessibility standards must be met as required by Title 24 of the California Code of Regulations (California Building Standards). If those standards are not met and it comes to the attention of the County, Code Compliance will enforce the standards. This includes accessible parking spaces that are properly sized, located, marked and constructed pursuant to County Code Sections 113.10.552(e), 13.10.554(a)4, and 13.10.554(d). Contact the Building Official for specific accessibility requirements.

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Alvin James, Planning Director