



# City of Santa Barbara

Public Works Department

[SantaBarbaraCA.gov](http://SantaBarbaraCA.gov)

April 19, 2023

#### Main Office

630 Garden Street  
P.O. Box 1990  
Santa Barbara, CA  
93102-1990  
Tel: (805) 564-5377  
Fax: (805) 897-2613

Name of Valet Operator  
Address  
Address  
City, State Zip

#### Engineering

Tel: (805) 564-5363  
Fax: (805) 564-5467

SUBJECT: Requirements for Valet Parking Operations in the City of Santa Barbara

Dear -----:

#### Facilities & Energy

Management  
Tel: (805) 564-5583  
Fax: (805) 897-2577

The purpose of this letter is to inform your valet business operation of certain federal, state, and local requirements related to accessibility. As an entity providing services to the public, valet operations must be in compliance with the Americans with Disabilities Act (ADA) as well as the California Statutes, and the City of Santa Barbara Municipal Code (SBMC).

#### Fleet Management

Tel: (805) 564-5402  
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Off-street valet operations with on-site parking locations must allow vehicles with an accessible parking placard or plate to self-park. Valet operators are required to keep all accessible spaces and associated access aisles unobstructed and available for parking for individuals with disabilities at all times. Off-street valet operations providing parking at a separate location must provide an accessible passenger drop-off and loading zone. Curbside valet parking requires approval of the Public Works Director.

#### Streets Operations

& Infrastructure  
Management  
Tel: (805) 564-5454

### Americans with Disabilities Act

#### Public Works

Downtown Team  
Tel: (805) 564-5385  
Fax: (805) 564-5467

The ADA does not specify guidelines for operations such as valet parking. However, the ADA does prescribe legal avenues for enforcement of the requirements.

#### Water Resources

Tel: (805) 564-5387  
Fax: (805) 897-1991

Valet operations fall under Subchapter III of the ADA which states that:

*“No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases (or leases to), or operates a place of public accommodation.”*

### California Building Code

The California Building Code (CBC) requires that parking facilities with valet parking provide accessible parking spaces to allow self-parking by people with disabilities and must also provide an accessible passenger loading zone (§209.4). This applies where parking spaces are provided on the same site as the valet parking service. However, if valet parking service is provided on a site without any parking spaces, accessible parking spaces are not required on the site. Policies and practices to accommodate people with disabilities must be in place under the Department of Justice’s ADA regulations.

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*11B-209.4 Valet parking.*

*Parking facilities that provide valet parking services shall provide at least one passenger drop-off and loading zone complying with Section 11B-503. The parking requirements of 11B-208.1 apply to facilities with valet parking.*

*Advisory 11B-209.4 Valet parking. Valet parking does not eliminate the requirement to provide accessible parking spaces. Some vehicles may be adapted with hand controls or lack a driver's seat, and may not be operable by a valet parking attendant. The parking space requirements of Sections 11B-208 and 11B-502 apply to facilities with valet parking, including the requirement for an accessible route of travel to the entrance of the facility. In addition, when valet parking is provided, a passenger drop-off and loading zone complying with Section 11B-503 shall be located on an accessible route of travel to the entrance of the facility.*

California Vehicle Code

Valet operators are reminded that the California Vehicle Code (CVC) prohibits the parking or standing of any vehicle without a special identification license plate or placard within a space designated for disabled persons. The CVC also prohibits the obstruction or blocking of access to such stalls. This applies to valet operations within a parking lot.

*Section 22507.8.*

*(a) It is unlawful for any person to park or leave standing any vehicle in a stall or space designated for disabled persons and disabled veterans pursuant to Section 22511.7 or 22511.8 of this code or Section 14679 of the Government Code, unless the vehicle displays either a special identification license plate issued pursuant to Section 5007 or a distinguishing placard issued pursuant to Section 22511.55 or 22511.59.*

*(b) It is unlawful for any person to obstruct, block, or otherwise bar access to those parking stalls or spaces except as provided in subdivision (a).*

City of Santa Barbara Municipal Code

The SBMC spells out requirements for valet operations within the City. There are specific requirements that pertain to operations within the public right-of-way compared to on-premises.

*30.175.090 Parking Area Design and Development Standards.*

*G. Valet Parking. Valet parking shall comply with all of the following:*

*1. Sites utilizing valet parking shall not use any street, alley, or City-owned parking facilities for automobile storage, pickup, drop-off, or interfere with any right-of-way without approval of the Public Works Director;*

*2. Vehicle movements in a tandem arrangement shall not take place on any street or alley;*

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3. *The valet drop-off lanes, and any associated kiosks or other similar items, shall be located to allow for the safe and efficient function of the valet operation, in that it will neither adversely impact the parking and internal circulation of the parking lot or any adjacent right-of-way, nor encroach into any required fire lane access area;*
4. *Valet parking shall not interfere with, reduce, remove, or utilize any automobile or bicycle parking spaces required for any other use; and*
5. *Sites utilizing valet parking shall ensure a parking attendant will be on duty at all times that the facility is in use, and sufficient staff and facilities to ensure that automobiles are moved for parking promptly. No automobile queuing or parking is allowed in travel lanes at any time. If the site is unable to satisfy the valet parking demand and queuing or double-parking occurs, the operation shall be temporarily closed, until the demand can be properly handled, and shall display a sign with the word "FULL" that is clearly visible to approaching traffic.*

Violations of any of the above may result in exposure to civil litigation or enforcement action. If you have any technical questions about your operation, it is suggested that you contact a Certified Access Specialist (CAsp) for consultation. Please reach out to me directly if you have any general questions about valet operations within the City of Santa Barbara.

Sincerely,



Brian D'Amour, PE  
City Engineer

BD/sk

Attachments

c: Brian Bosse, Downtown Team Manager  
Derrick Bailey, Acting Streets Operations and Infrastructure Manager  
Sarah Clark, Acting Downtown Team Manager