



November 27, 2019

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Mayor Schwedhelm
Planning Commission Chair Cisco
City Hall
100 Santa Rosa Avenue
Santa Rosa, CA 95404

RE: Draft Preferred Plan Concept for Santa Rosa's Downtown Station Area Plan Update

Dear Mr. Schwedhelm and Chair Cisco,

TransForm participated in the original 2007 Downtown Station Area Specific Plan (DSASP) and supports the City's redoubled efforts to promote transit oriented development. Especially in the aftermath of the 2017 Tubbs Fire, infill housing is needed now more than ever.

We encourage the City to be more ambitious in the Draft Preferred Plan Concept about supporting more housing for people rather than for cars. We support the proposed facilitation of shared parking, but the City could be more ambitious about relaxing residential parking requirements in order to show a policy commitment to infill housing. We are not alone in this assessment. A November 2018 report by the Council of Infill Builders, Accelerating Infill in Santa Rosa and Sonoma County, spelled out the vision and key barriers of builders, public officials, financial leaders, affordable housing developers and architects. The vision included an ambitious goal of 30,000 new housing units built in existing urbanized areas, reduced reliance on vehicle travel and reduced inequity in housing. Key barriers included the high cost and lack of policy for infill development.

The Draft Preferred Plan Concept calls for waiving parking requirements only within ¼ mile of high frequency transit. Based on transit trip data we have available from GreenTRIP Connect, this currently applies only to the 2nd Street Transit Mall. We strongly recommend expanding the area for which the residential parking requirement would be waived. We recommend eliminated parking requirements for the entire DSASP area or at least expand it to within ½ mile of frequent transit. It takes approximately 10-15 minutes to walk half a mile.

TransForm supports lower parking ratios because outdated parking requirements stand in the way of building homes. Parking requirements contribute to the high cost of development, higher rents, and encourage the use of vehicles to get around. The report by the Council of Infill Builders echoed this. An average structured parking space costs approximately \$50,000 to build, not including the cost of land and maintenance. A parking space accounts for approximately 16% of rent (nationally), or \$142/month, when it is not unbundled. If parking is required for every residential development, then people are not given a choice about paying for a parking space because a variety of housing options is not available--this is a social equity issue because it forces low income households to pay for parking whether they want it or not. Since 2007, the plan area has only built 100 units —this is evidence that parking minimums need to be eliminated for the City to truly prioritize housing production and affordability.

In 2007 we recommended the city code change from parking minimums to parking maximums — and we recommend that again. We recommend a maximum parking ratio to prevent an over-supply of parking, prevent traffic, and to create more space available for units and less expensive units. Specifically, we recommend a parking maximum of an average of 1.0 space per unit in the DSASP, which falls under the “Urban Center” place type in the [GreenTRIP Certification How-to-Guide](#). Our Bay Area GreenTRIP Parking Database shows an average of 28% of spaces are unused, representing over \$198M in construction costs (<http://database.greentrip.org/>).

Attached is a report from TransForm’s GreenTRIP Connect tool, which instantly calculates reductions in driving, greenhouse gas emissions and parking demand from projects built in smart locations with traffic reduction strategies and affordable housing. This report includes parcels the Draft Preferred Concept Plan identified as vacant, underutilized, and City-owned with Opportunity Areas. When the conceptual design includes a \$50/month fee for unbundled parking and the provision of one free/ deeply discounted transit pass per unit, and 20% units for Low Income households (making 51-80% Area Median Income), the estimated parking demand is a ratio of 0.79 spaces/unit. Even without these traffic reduction strategies, parking demand is estimated to be 1.02 spaces/unit. The heat map shows the area within ½ mile of the transit mall offers 42-48 transit trips per hour--the best Santa Rosa and Sonoma County has to offer. This underscores the importance of building higher densities and lower parking ratios within the DSASP. You may access the online version of the report here: <https://connect.greentrip.org/map-tool.php?p=211228>

The Draft Preferred Concept Plan does not include discussion of affordable housing, and we recommend prioritizing affordable housing within ½ mile of the 2nd Street Transit Mall (and any future high frequency transit areas) and eliminating parking requirements for affordable housing within the DSASP. Our research shows that higher income households own twice as many vehicles and drive twice as many miles as extremely low-income households living within a ¼ mile of frequent transit. Lower income households drive less and use transit more regardless of whether they live near frequent transit or not. If they live within ¼ mile of frequent transit, they will drive up to 50% less; if within ½ mile then they’ll drive 25-30% fewer miles. Locating affordable housing near transit furthers social equity so that these households have a better chance to get where they need to go.

Again, we respectfully encourage the City of Santa Rosa to be more ambitious in the Draft Preferred Plan Concept about supporting more housing for people rather than for cars.

Sincerely,



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