



May 4, 2021

Land Use Planning Division
City of Berkeley
1947 Center St, 2nd Floor
Berkeley, CA 94704

Dear Mr. Horton and Ms. Shen,

TransForm strongly encourages BART and the City of Berkeley to minimize parking at BART station transit-oriented development (TOD) projects at North Berkeley and Ashby for both residents and BART patrons in order to maximize housing, especially affordable housing, and reduce greenhouse gas emissions.

For more than a decade, TransForm has pioneered initiatives to right-size parking at TOD sites, research the climate and equity benefits of affordable homes, and facilitate deep and authentic community engagement in planning processes, particularly with communities of color and other underserved neighborhoods.

In 2018, TransForm partnered with BART to provide support with technical analysis and community engagement for new transit-oriented developments at BART's "Urban with Parking" Stations, which includes Ashby and North Berkeley, and developed a technical report entitled "Measuring the Promise of TOD: A Proposed Methodology for BART." This report informs these comments, and will be available by the end of the month.

It's been proven that people living near BART stations drive less and therefore create fewer greenhouse gas emissions. Nearly three-quarters of households living within half a mile of a BART station own only one vehicle, or none at all.¹ People living within half a mile of a BART station are three times more likely than people who live further from a BART station to walk, bike, or take public transit to work.² Reducing parking and increasing housing will increase BART ridership overall: the updated BART Station Access Model estimates that, despite losing 440 riders per day due to reduced BART patron parking, the TOD land uses add 2,270 riders per day, resulting in a net increase of 1,830 riders per day.³

¹ BART, *Transit-Oriented Development Guidelines*, Version 2.0, May 2017, p.9, <https://www.bart.gov/about/business/tod/guidelines>

² BART, *Transit-Oriented Development Guidelines*, p.9.

³ TransForm, *BART Station Access Model Outputs*, December 2, 2020.

The evidence is clear—the current level of parking at “Urban with Parking” BART stations such as Ashby and North Berkeley is expensive, unnecessary, and counter to our housing affordability and greenhouse gas reduction goals. Prioritizing public space and funding for affordable homes and sustainable transportation options will help us build the equitable, zero-emission communities we want, and work toward undoing a long history of racist and exclusionary planning.

While the right-sized parking approach applies to both BART station projects, each neighborhood has some unique characteristics that should be considered individually.

North Berkeley

Currently, approximately 74% of North Berkeley patrons access the station using sustainable modes—by walking, biking, taking transit or being dropped off. Approximately 25% access the station by driving to and parking at or near the station.⁴ This number fell from over 40% in 2008, reflecting the growing demand for accessing the station via sustainable modes. By continuing to improve access to the station—through increasing bus frequency, improving the Ohlone Greenway for walking and biking, and providing more safe bike parking—the City and BART can continue to encourage this shift away from driving, preserving valuable public land for housing.

Further, BART parking is underpriced relative to market demand—unlike stations in suburban areas, the North Berkeley parking lot does not fill up until 9:30am, indicating excessive supply. Just 1.2 miles from the North Berkeley station is the Allston Way Garage, which was only 60% occupied during the week, before the Covid-19 shelter-in-place order. For those with no other option other than to drive, the Allston Way Garage, at a half block distance from the Downtown Berkeley BART station, provides a suitable alternative. The Allston Way Garage charges market rates for parking. BART studies show that there is a strong correlation between BART users who have cars and higher incomes, especially at the “urban with parking” stations such as North Berkeley and Ashby. Charging drivers at a rate that represents the actual cost of parking will help more fairly redistribute the cost of accessing BART.

In addition, the current allocation of street parking through the Residential Parking Permit (RPP) program is inequitable and further reinforces the privatization of public space for those with economic privilege. Currently, RPP permits are available to Berkeley residents in the zoned areas for just \$66 a year. This guarantees the public space, paid for by city, state, and even federal tax payer dollars, is reserved for residents, which in North Berkeley means many high-income homeowners. Berkeley currently prohibits RPP permits from being allocated to residents of new developments, including affordable housing. This maintains a system that prioritizes access to public space for people with high incomes, and leaves the future residents of the hundreds of

⁴ BART, *Station Profile Study*, 2015.

units of affordable housing planned for the North Berkeley BART station without access to the same amenity. Restructuring the RPP system in a way that charges residents what the public space is worth and provides access to new residents, especially of affordable housing developments, to the same public space, will help create a more equitable and sustainable parking program.

Ashby

While the neighborhood context is different and the risk of displacement for existing residents is higher than in North Berkeley, Ashby patrons are even less likely to drive alone and park than at North Berkeley. Fewer than 20% of BART patrons drove alone and parked in 2015, down from 25% in 2008⁵. Those that still drive often travel about a mile from their homes, indicating a huge potential for encouraging access by alternative modes. Understanding the barriers and incentives that would support access via sustainable modes for these residents should be included in the planned access study, and subsequently addressed as part of the development plan.

Parking for both patrons and residents should be as low as possible, so that the public space at Ashby can be prioritized for much-needed affordable housing, and community-desired assets such as the Berkeley Flea Market and Berkeley Farmers Market. Any parking that is built at the station should be prioritized for residents with disabilities, given the proximity of the Ed Roberts Campus, and the proposal for disability-specific housing at the site.

In addition, the Adeline Corridor Plan, adopted by the Berkeley City Council on December 8, 2020, supports implementing “innovative strategies that make efficient use of existing parking resources while reducing demand for additional parking.”⁶ The plan states, “In recognition of the presence of high-frequency transit, to lessen the cost of newly built units, and to reduce traffic congestion in the Plan Area, the City encourages reduced amounts of parking in new development projects.”⁷ Providing very little parking at the BART station reflects the priorities outlined in the Adeline Corridor Plan.

Conclusion

Living next to BART provides excellent access to high quality transit. We also know that BART doesn't go everywhere, and residents will need to access other amenities that are not BART-accessible. An access plan that increases connectivity via other modes including buses, carshare, ride hail, bikes, and scooters will be an important part of a comprehensive plan to meet the mobility needs of residents, especially the residents of the planned affordable units. According to TransForm's report, up to 7% of trips to the station can be shifted from drive and park to sustainable modes with the right access investments,⁸ which is a third of the shift needed

⁵ BART, *Station Profile Study*, 2015.

⁶ City of Berkeley, *Adeline Corridor Specific Plan*, 2020.

⁷ City of Berkeley, *Adeline Corridor Specific Plan*, 2020.

⁸ TransForm, *BART Station Access Model Outputs*, December 2, 2020.

at Ashby and a quarter of the shift needed at North Berkeley. Transportation Demand Management (TDM) strategies such as creating parking for electric carshare with discounts for low-income residents, bus passes, or a comprehensive mobility wallet with all of these options, will ensure that parking elimination for TOD residents does not impede their mobility options. Our research shows that the people who will live in these future TOD homes will drive approximately 85% than the regional average and release 67 percent fewer greenhouse gas emissions.

In summary, in developing the Joint Vision and Principles and developing the Station Access Plan, TransForm strongly encourages BART and the City of Berkeley to:

- Minimize both BART patron and TOD resident on-site parking;
- Invest in increasing BART access by sustainable modes;
- Provide additional TDM strategies targeted to the needs of low-income and disabled residents of new developments;
- Charge market rates for parking for BART patrons, on-street parking, and residential parking permits in neighboring areas.

Thank you,

Darnell Grisby
Executive Director
TransForm