

Ayres, Julia

From: Kendra Ma <kendrama@transformca.org>
Sent: Tuesday, August 23, 2022 3:58 PM
To: Swiecki, John; Johnson, Kenneth; Ayres, Julia
Cc: housingelements@hcd.ca.gov
Subject: Brisbane Draft Housing Element Comment
Attachments: Brisbane HE Comments_TransForm.pdf

Follow Up Flag: Follow up
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Hi Brisbane Community Development Team,

My name is Kendra and I am the Policy Analyst at TransForm. We are a nonprofit policy advocacy organization focusing on better land use and transportation policy at the local, regional, and state level. Thank you for releasing a draft of the City's Housing Element for review and public comment. Our team has put together some feedback that we would like to see addressed in the Housing Element.

We applaud the City for releasing their draft Housing Element for feedback. We'd love to see if the Element can include clearer goals and language around parking policies and TDM strategies. Please see the attachment in this email to see our comments and recommendations.

Feel free to reach out if you have any questions - we know this is a busy time of year and we thank you so much for your hard work around this!

Thanks,
Kendra

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Kendra Ma, Policy Analyst
(she/her/hers)

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August 23, 2022

Community Development Department
City of Brisbane
50 Park Place
Brisbane, CA 94005

Re: Draft Housing Element Needs Ambitious Parking Updates

Dear Brisbane Community Development Department,

TransForm is a regional non-profit focused on creating connected and healthy communities that can meet climate goals, reduce traffic, and include housing affordable for everyone. We applaud Brisbane's work to date on the Draft Housing Element. However, to meet housing, transportation, and climate goals, Brisbane needs to expand on its successful programs and initiate some new ones.

In particular, there will need to be an effective mix of:

- Reducing parking provision and providing incentives and programs to drive less (Transportation Demand Management or TDM)
- Developing sufficient programs to meet affordable home targets of RHNA

We appreciate Program 6.A.5 which will continue a study to potentially lower parking standards. However this program has an excessive timeline given it is a continued policy from the previous cycle, and does not commit to any specific parking reforms. We do support the work Brisbane has done in this area, including the last cycle's parking reforms which lowered parking space requirements and linked parking provision to unit size, yet as the housing crisis grows and as we see stronger, newer models of parking policy it is time for stronger commitments to reform.

The need to eliminate or greatly reduce parking minimums is more important than ever. **Each new parking space costs \$30,000-\$80,000.**¹ With inflation driving up construction costs since these estimates, two spaces may now cost up to \$200,000. Beyond construction costs, parking takes up essential space that could provide more homes, services, or community amenities.

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<https://www.shoupdogg.com/wp-content/uploads/sites/10/2016/05/Cutting-the-Cost-of-Parking-Requirements.pdf>

TransForm recommends that Brisbane consider the following policies in the Housing Element:

1. Requiring unbundled parking for certain transit oriented developments. This is easier for building managers to implement now with new parking tech tools like [Parkade](#).
2. Implementing TDMs such as requiring developers to buy annual bus passes for residents at a discounted bulk rate.

To show the tremendous transportation and climate benefits of these policies, as well as some of the financial savings for residents and reduced costs for development, we have used our GreenTRIP Connect tool to [create scenarios](#) for a potential future development site at **145 Park Lane**. This site is identified in Brisbane's draft Housing Element Site Inventory as a potential future opportunity site outside of any specific zoning district with lower parking provision. The California Office of Planning and Research recommends GreenTRIP Connect as a tool to use while developing General Plans and is especially useful during the development of Housing Elements (the tool is free to use and supports better planning at the site and city-wide level).

By implementing the strategies above at **145 Park Lane**, GreenTRIP Connect predicts:

1. Implementing unbundling and providing transit passes at this site would decrease demand for parking by 36% and result in resident transportation savings of \$792 per year.
2. With right-sized parking, incorporating the benefits of unbundled parking and free transit passes, the development would cost \$6,378,000 less to build relative to current parking standards.
3. When combined with 100% affordable housing these strategies resulted in an incredible 60% reduction in driving and greenhouse gas emissions for the site, compared to the city average.
4. If an affordable development with smart parking strategies were built on this site each household would drive 6,282 less miles per year creating a greener and safer community.

By eliminating the high costs of parking, homes can be offered at more affordable prices, reducing the number of community members that face extreme housing cost burdens, getting priced out of their community, and/or becoming unsheltered. Residents, new and old alike, will greatly benefit from the reduction in vehicle traffic and associated air pollution (see scenarios [here](#)).

In addition to parking and transportation strategies, we applaud some of the proposed strategies to support more affordable homes, since these would have such tremendous benefits as noted in the GreenTRIP scenario. Two of the most important are Programs 2.D.1 and 2.E.1 that streamline affordable development to help reach RHNA goals, by subsidizing the cost of affordable housing through fee waivers and adopting an Affordable Housing Strategic Plan, respectively. These programs are a cost-effective complement to strategies focused on housing production.

The GreenTRIP scenarios and the chart on the final page of our Scenario document also show the imperative of programs to accelerate development of affordable homes, like Programs 2.D.1 and 2.E.1. Not only do these households use transit more and drive much less than average, but success in this area can help provide homes for unsheltered individuals and families. A commitment to these programs will show that Brisbane is committed to planning for all levels of the 803 BMR RHNA units anticipated in this cycle.

Please let me know if you have any questions. TransForm hopes this information explains why Brisbane should make parking reform a priority in the Housing Element update.

Sincerely,
Kendra Ma
Housing Policy Analyst
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