

To: Ms. Renz-Whitmore and Ms. Barkhurst, Planning Department
From: Andrew De Garmo and Lawrence Kline FAICP, Transit Department
Date: September 10, 2019
Re: Proposed amendment "T" to the IDO, relating to parking reductions on transit routes

The analysis stated under the "Purpose" section of the proposed amendment is well done and correct. But in discussing the question here at Transit, we find:

1. Due to detailed variations in individual route schedules, the results of attempting to calculate frequency can sometimes be surprising and inconsistent; and,
2. Since transit and land use are inseparable, perhaps the question should be viewed through the land-use prism rather than solely through transit.

As to the vagaries of approaching the question only as one of transit provision, an example is the service on San Mateo Blvd. Two routes serve San Mateo from the VA Hospital to I-25. They overlap each other in a deliberate way in order to provide twice as frequent service on the "trunk" of the route, but they branch at Osuna and Jefferson to provide less frequent service to areas that generate lower ridership. Thus, not counting the frequent service of the two combined routes along the 6.5 miles of San Mateo would unnecessarily discount the value of that combined frequency. Furthermore, a precise analysis of the current schedules shows that, the combined frequency varies from 14 to 16 minutes (28 to 32 minutes for each route), so a location on San Mateo, which functionally has service at around 15 minutes, might not even qualify for the proposed 30-minute criteria – and might slightly exceed the current 15-minute standard while a stop across the street meets it. Variations on this scenario appear throughout the route system.

Why Not Use Land-Use Instead?

What we find might be a more logical approach is to look at the question of parking reduction as being part-and-parcel of land use decisions driven by transit routes, and conversely driving decisions about the distribution of transit services through land use concentrations.

The Centers and Corridors section of the Comprehensive Plan has been a central theme ever since the first Comprehensive Plan was written in the 1970s. The concept was given even more weight with the passage of the new Comprehensive Plan and the IDO. It is given further definition by the creation of "Areas of Change". It is given even more weight by MRCOG, which is relying on a "preferred" growth scenario to model a development vision that supports those same centers and corridors.

In an ideal world:

- Parking Reductions would be an integral part of community centers as mapped in the Comprehensive Plan independent of frequency at this point in time.
- Parking Reductions would be an integral result of proximity to transit routes in corridors and particularly transit stops independent of frequency at this point in time.
- No-one would be required to take the reduction. There are simply areas of the city where even re-development is going to be driven by [1] land uses that are not transit compatible and [2] transit routes that are too weak to effectively overcome the SVO culture.

In our view, redevelopment areas (parts of Corridors, certain Centers) might lie fallow for many years. Eventually tho' such parcels will be seen as economically ready to redevelop. (We see it happening on Fourth Street and on Central Avenue today.) These parcels should be offered, and be encouraged to take, parking reductions. Since success often drives competition in real estate, redevelopments should collect along a Corridor or in a Center. Developers who do not take the reduction today might look back in ten years and say "I can add land use – rental income –without buying more land. I'll just have less parking."

The (perceived) lack of parking will start to drive the need for a proven transportation alternative to SVO, i.e., transit. We should then concentrate on improving transit service in those centers and corridors. In this way, transit and transit-related development become the cornerstones for development in the centers and corridors. This would help maximize density (with the concomitant environmental savings) and maximize ridership on the transit system which has measurable economic benefit to the individual as well as other environmental savings.

So we think that parking reductions should not be organized around land use or transit alone, but around encouraging development with parking reductions in centers and corridors that can (by design) also take advantage of transit. To that end we would tentatively suggest:

- Universally, a 10% reduction (like the old rule) for property on a transit route
- In more suburban areas, a 20% reduction when within 1320 feet of the centerline of a route designated as a "Main Street Corridor", "Premium Transit Corridor", or "Major Transit Corridor"
- In Centers, 20% for properties in the Center but not on a route, and 30% for properties in the Center that also front on a transit route.

In short: Parking reductions are not viewed as an incentive for most developments. They will be rarely taken unless there is economic incentive – profit –in taking them. Instead of thinking of parking reductions as a simple solution to the bane of the SVO, we should integrate the concept with the Centers and Corridors concept to maximize density and economic benefits over time.