



September 28, 2022

Petaluma Planning Team
Planning Division
11 English Street
Petaluma, CA 94952

Re: Petaluma needs transformative parking measurements to eliminate development restraints

Dear Petaluma Planning Division,

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. Generation Housing is leading the movement for more, more affordable, and more diverse housing in Sonoma County. Together, we champion effective policy, sustainable funding resources, and collaborative efforts to create an equitable, healthy, and resilient community for everyone.

Given the tremendous need for housing in Petaluma, we recognize Petaluma's work to date on the 6th Cycle draft Housing Element ("Draft"). Specifically, we acknowledge Program 5, which demonstrates the City's plan to adjust mixed-use development requirements and zoning code constraints, such as parking, to support adaptive reuse of non-residential spaces. The goal of updating onsite parking regulations is to reduce barriers to housing development and support the City's climate goals is critical to ensuring the sustainability and healthy growth of the community, and we appreciate the City's efforts to achieve this goal by December 2023. We also commend the City for its inclusion of Program 7, which acknowledges parking as a constraint to development and that current parking standards may be updated for various housing types, and Program 25, which recognizes that the City may consider reducing parking requirements to facilitate the development of larger rental units in 2024.

Most importantly, we were thrilled to see the City begin a series of parking studies in early 2022, identifying how parking shapes and impacts the growth of its community. For instance, Study Session One identified a number of tools to help the city align their parking standards to other City-wide goals, such as the elimination of parking minimums, reducing minimum requirements, establishing parking maximums, and unbundling parking. We applaud the City for acknowledging the connection between parking and other parallel policy and programmatic efforts that are currently under review by means of the General Plan and Housing Element update. Because the City has recognized the strong connection between parking policy and its other City-wide goals for growth and development, TransForm and Generation Housing have

partnered to share opportunities for the City to strengthen its Housing Element so that everyone benefits from a healthy, sustainable, and livable City.

Recommendations

While Petaluma has recognized the importance of parking reform and Transportation Demand Management (TDM) programs in its draft Housing Element and Parking Study Sessions, **we recommend the City expand on its successful programs and implement some new ones.** In particular:

- **Dedicate funding to revisit the Parking Study Sessions** in order to align with other City-wide climate, transportation, and housing goals. Not only does the Parking Study connect with the draft Housing Element, it looks at how outdated metrics and policies such as parking minimums in the Implementing Zoning Ordinance and SmartCode can be updated to advance a more vibrant economy and community
- **Reduce the amount of parking mandated** for housing and provide incentives and programs to drive less by implementing TDMs
- **Require unbundled parking** for certain transit oriented developments
- Encourage developments to **subsidize transit passes** in return for reduced parking provision

Along with the previous recommendations, the City has the opportunity to explore another opportunity to reduce car-dependency and promote a more pedestrian and bike-friendly community that encourages future transit service and infrastructure in the area. **The passage of Assembly Bill 2097 presents a critical opportunity to expand the development of right-sized housing along the SMART transit corridor.** Currently, Petaluma’s municipal code requires one space per unit but no fewer than 1.5 spaces per multifamily unit. With the elimination of costly parking mandates, the “15-Minute City” can be closer to becoming reality as future residents have more choices to decide whether they want to pay for parking, or have lower-cost housing in walkable, transit-friendly neighborhoods.

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 TransForm’s GreenTRIP Connect tool to create [scenarios](#) for a potential future development site at **300 Water Street**. This site is identified in Petaluma’s draft Housing Element Site Inventory as a privately-owned potential future opportunity site for this Regional Housing Needs Allocation cycle. The California Office of Planning and Research recommends GreenTRIP Connect as a tool to show how much money and space can be saved when implementing traffic reduction strategies and TDMs—money that can be used to build more housing. Also, GreenTRIP Connect is recommended for 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 **300 Water Street**, GreenTRIP predicts:

1. A 37% decrease in demand for parking and resident transportation savings of \$756 per year by implementing unbundling and providing transit passes at this site.
2. With right-sized parking, incorporating the benefits of good location, unbundled parking, and free transit passes, the development would cost \$4,529,000 less to build relative to current parking standards.
3. When combined with 100% affordable housing, these strategies resulted in an incredible 72% 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 9,125 fewer miles per year, creating a greener and safer community.

The high cost of parking raises the cost of housing development, impacting the City's ability to meet its production goals. 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](#)).

Finally, in addition to our recommended parking and transportation strategies, **we applaud 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 include Program 6, which will minimize governmental constraints to affordable development and Program 15, which will increase opportunities for building at higher densities in single-family and lower density neighborhoods. These programs are a cost-effective complement to strategies focused on housing production, especially for households earning less than the Area Median Income. Not only do the lower wage earners that make up affordable 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 Petaluma is committed to planning for all levels of the 1100 Below Market Rate units anticipated in this cycle.

Thank you again for your work around this important opportunity. We recognize the enormous resource burden that the Housing Element demands and are hopeful that the recommendations from TransForm and Generation Housing are useful in the completion, approval, and implementation of this plan.

Should you have any questions or concerns about the comments shared in this letter, please feel free to contact TransForm's Housing Policy Analyst, Kendra Ma at kendrama@transformca.org, or Generation Housing's Policy Director, Calum Weeks, at calum@generationhousing.org.

Sincerely,

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