

## CALIFORNIA COASTAL COMMISSION

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# W15a

**LCP-3-STC-20-0040-2-PART A (PARKING STANDARDS)**

**JUNE 9, 2021 HEARING**

**CORRESPONDENCE**

## Re: June 9th Agenda Item #15-a. City of Santa Cruz LCP Amendment - Parking Standards

Moroney, Ryan@Coastal <Ryan.Moroney@coastal.ca.gov>

Thu 6/3/2021 10:02 AM

To: A Webb <aw.info.sub@gmail.com>

Hi Ms. Webb:

Thank you for your email and your participation in this process. I forwarded your email to the City and their response is below. From our perspective, we do not believe the proposed changes will significantly impact coastal resources, which is why we are recommending approval. I'd be happy to discuss further if you would like to arrange a time to talk.

City responses:

- 1) The highlighted text is already part of the LCP IP and the City Municipal Code, and not proposed for any amendment with this package. Allowable parking reductions for other types of housing are included in Section 24.12.290. The letter writer may also find it useful to review the parking reductions that are required for certain development proposals under the State Density Bonus Law.
- 2) Yes, this means any park and ride lot or transit center. SCMC 24.12.240(ah) defines that uses in Parking District No 1 (Downtown) shall provide parking in conformance with the resolution of the city council for this district in effect at the time of submission of a complete application. Parking requirements are defined in that parking resolution: <https://www.cityofsantacruz.com/home/showpublisheddocument/79214/637182277926130000>.
- 3) The existing uses in an area were permitted under the code in place at the time of construction. Unbundling is associated with the cost of parking, and the requirement that there be parking management on street aims to reduce the impacts of spillover parking impacts of new development on existing uses – and residents of the new development are not eligible to purchase street-parking permits. The residential parking permit program is managed by the Public Works Parking Division. There are limits on the number of residential and guest permits available to each eligible address within a permit zone, and a defined process for adding new zones or expanding existing zones. See <https://www.cityofsantacruz.com/government/city-departments/public-works/parking-services/residential-parking-permit-program> and <https://www.codepublishing.com/CA/SantaCruz/#!/html/SantaCruz10/SantaCruz1041.html>

Ryan Moroney  
California Coastal Commission  
Central Coast District Supervisor

Please note that public counter hours for all Commission offices are currently suspended indefinitely in light of the corona virus. However, in order to provide the public with continuity of service while protecting both you and our employees, the Commission remains open for business, and you can contact staff by phone, email, and regular mail (see staff contact information at [www.coastal.ca.gov/contact](http://www.coastal.ca.gov/contact)). **For my situation, Email is strongly preferred, with a hard copy by US Mail. (Our office is not able to accept delivery by FedEx, UPS, and other such delivery services at the entire building is closed).** Finally, things may take a little longer than usual during this period of time. Thank you for your patience and

understanding as we all work through this public health crisis.

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**From:** A Webb <aw.info.sub@gmail.com>

**Sent:** Monday, May 31, 2021 5:21 PM

**To:** Moroney, Ryan@Coastal <Ryan.Moroney@coastal.ca.gov>; CentralCoast@Coastal <CentralCoast@coastal.ca.gov>

**Subject:** June 9th Agenda Item #15-a. City of Santa Cruz LCP Amendment - Parking Standards

Dear Coastal Commission:

There are 3 Exhibit Items that I am submitting comments for, numbered below.

I think it is important that all housing projects measure the walking distance via sidewalks and safe pathways to major transit stops (if any exist - see definitions) within the State's 1/4 mile radius guideline for "transit rich housing projects". It could end up being so much further a walk (vs. as the crow flies) and accommodations for the resident might need to be considered under certain real world circumstances. There are already no parking, and parking reductions, being invoked on approved projects and pending applications under this guideline and residents just aren't always going to fit the ideal mold - especially when desperate for "affordable" housing. Medical emergencies can strike at any time, further limiting mobility to get to a bus, or their work may be car dependent (landscaping, cleaning, and other lower paying self employment) so reasonable access to some committed offsite parking is important, and only SRO projects seem to be indicating that here. How is this equitable?

**1. Exhibit page 7 - 3.b.**

"b. SRO parking requirements may be reduced by one-quarter space for each dwelling unit if the project is either located:

- (1) Within one-quarter mile or one thousand three hundred twenty feet of an alternative parking facility and spaces are available and can be committed to residents; or
- (2) Within one-quarter mile or one thousand three hundred twenty feet of access **to public transportation such as a bus stop.** "

**SB-827 uses the term bus stop as being on a "high-quality bus corridor"** - defined as offering service every 15-, 20-, or 30-minutes depending on days/times of day - which I don't believe Santa Cruz Metro has. Their schedules typically run every hour.

***"Bus stop" should instead be defined as a stop on a "high-quality bus corridor" as defined in state law below.***

**Reference:**

**SB-827 Planning and zoning: transit-rich housing bonus**

[https://leginfo.legislature.ca.gov/faces/billCompareClient.xhtml?bill\\_id=201720180SB827&showamends=false](https://leginfo.legislature.ca.gov/faces/billCompareClient.xhtml?bill_id=201720180SB827&showamends=false)

SB-827:

*(d) "High-quality bus corridor" means a corridor with fixed route bus service that meets all of the following criteria:*

(1) *It has average service intervals of no more than 15 minutes during the three peak hours between 6 a.m. to 10 a.m., inclusive, and the three peak hours between 3 p.m. and 7 p.m., inclusive, on Monday through Friday.*

(2) *It has average service intervals of no more than 20 minutes during the hours of 6 a.m. to 10 a.m., inclusive, on Monday through Friday.*

(3) *It has average intervals of no more than 30 minutes during the hours of 8 a.m. to 10 p.m., inclusive, on Saturday and Sunday.*

(f) *"Major transit stop" means a site containing an existing rail transit station, or a ferry terminal served by either bus or rail transit service.*

(i) *"Transit-rich housing project" means a residential development project the parcels of which are all within a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor. A residential development project does not qualify as a transit-rich housing project if that project would result in the construction of housing in zoning districts that prohibit the construction of housing as a principal or conditional use, including, but not limited to, exclusively industrial or manufacturing zoning districts. A project shall be deemed to be within a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor if both of the following apply:*

(1) *All parcels within the project have no more than 25 percent of their area outside of a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor.*

(2) *No more than 10 percent of the residential units or 100 units, whichever is less, of the project are outside of a one-half mile radius of a major transit stop or a one-quarter mile radius of a stop on a high-quality bus corridor.*

## **2. Exhibit Page 9 - Transit Center referenced in Bike Parking Chart - e.**

" e. Park-and-ride lots **and transit centers** 35% of auto parking, 80% Class 1 20% Class 2 "

**Questions:** Transit Center - **does that mean the Metro Center downtown?**

If so, I did not see any car parking in the new Metro plans. **How will bike parking be determined?**

## **3. Exhibit Page 18-e Unbundled Parking:**

" e. Unbundled Parking. Residential development and the residential portion of mixed-use development may propose that parking be unbundled from the purchase or lease of an individual living unit **where there is either an existing residential permit parking program**, in conformance with Municipal Code Chapter 10.41 or other control limiting on-street parking on all roadways within a five hundred-foot minimum walking distance from the pedestrian entrances to the building or site."

### ***This raises many questions:***

Is there an up-to-date analysis done annually by the City, and especially when a new project is considered, to first determine if there are parking spaces **available enough** for **existing eligible** housing in the residential program area, especially with ADUs being added using street parking, and then determine if the addition of the unbundled parking spaces requirements/needs can be accommodated? There must be some kind of limits for numbers of permits, and regular review to determine if program expansions are needed, is there not? Where is that addressed? As it reads, it's too vague.

6/7/2021

Mail - Moroney, Ryan@Coastal - Outlook

Residential neighborhoods in the Coastal Zone are already heavily impacted, whether it is inside permit zones and during permit enforcement periods or not, especially closer to the beaches it is.

Thank you for carefully considering these points.

Sincerely,

Anita Webb