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August 8, 2017

Mayor John W. Minto
City of Santee
10601 Magnolia Avenue
Santee, CA 92071

RE: Modifications to Parking Regulations and CEQA Exemption (Council Agenda Item 2A)

Honorable Mayor, Vice Mayor, and Council Members:

On behalf of Circulate San Diego, whose mission is to promote excellent mobility choices and healthy, vibrant neighborhoods, I write with comments strongly advising against the City of Santee's proposed modifications to Chapter 17.24 "Parking Regulations" and CEQA exemption per CEQA Guidelines Sections 15061(b)(3) and 15305.

1. Increased parking requirements for new developments will incentivize driving and worsen traffic.

Circulate San Diego strongly advises against the City of Santee's modifications to Chapter 17.24 of the Municipal Code, "Parking Regulations." Excessive parking is highly correlated and is a "likely cause"¹ of increased driving, as demonstrated by research presented at the Transportation Research Board in 2016. Incentivizing increased car dependence therefore disincentivizes the use of alternative modes of transportation such as walking, bicycling, transit, carpooling, and other forms of transportation that are not single-occupancy vehicle trips.

The increased driving that results from excessive parking requirements will worsen traffic throughout the City of Santee and along the nearby freeways, and increase greenhouse gas emissions.

2. Increased parking requirements for new developments will increase housing costs.

Countless articles, studies, and lived experiences indicate that the entire San Diego region is in a worsening housing crisis which is, in part, a result of the lack of housing production on pace with population growth. Increasing parking requirements directly increases the cost to build every multi-family development. The national average construction cost for a single above ground parking space is

¹ Emily Badger, "The Problem With Too Much Parking," The Washington Post (January 15 2016), available at <https://www.washingtonpost.com/news/wonk/wp/2016/01/15/the-problem-with-parking>.

\$24,000.² This cost increases significantly if it is required to be built underground and does not account for the cost of land or lost development capacity.

Added costs to developments are either passed on to the renter, or they may be so high that home builders may choose to build fewer homes overall. According to research by the pre-eminent scholar on parking economics and urban planning, Dr. Donald Shoup, “parking requirements raise housing costs.”³ The answer is more homes, not more parking spaces.

3. Increased parking requirements may cause a significant environmental impact.

The modifications to the parking standards warrant an environmental review and an exemption is not appropriate. CEQA Guidelines Section 15061(b)(3) exempts activities from which it can be seen with certainty that there is no possibility that the activity in question may have a significant environmental impact. According to the Santee Housing Element,⁴ Table 6.1, the City’s objective for new construction is 1,085 units total from 2013-2021. Over the course of the four years remaining in the Housing Element, Santee is expected to build 543 units and therefore hundreds of additional parking spaces as a result of the modified parking standards currently under consideration. Therefore, the increased driving resulting from increased parking spaces may cause an impact in transportation and traffic as well as greenhouse gases.

4. Conclusion.

Adoption of the modified parking standards would result in increased traffic, greenhouse gas emissions, and housing costs. In addition, these modifications may cause a significant impact and therefore must be studied. Now is the time to promote modes of transportation that will improve the quality of life in Santee, not to make the City more expensive and car dependent.

Thank you,



Maya Rosas
Advocacy Manager

² Shoup, Donald, ACCESS Magazine, Cutting the Cost of Parking Requirements (2016), available at http://www.accessmagazine.org/wp-content/uploads/sites/7/2016/05/access48-webprint_cuttingthecost.pdf.

³ Shoup, Donald, ACCESS Magazine, The High Cost of Free Parking (1997), available at <https://www.accessmagazine.org/spring-1997/the-high-cost-of-free-parking>.

⁴ City of Santee, Housing Element (2013-2021), available at <http://cityofsanteeca.gov/Home/ShowDocument?id=2331>.

CC:

Vice Mayor Ronn Hall
Council Member Stephen Houlahan
Council Member Brian W. Jones
Council Member Rob McNelis
Marlene Best, City Manager
Melanie Kush, Director, Development Services