

**Flynn, Maria**

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**From:** Jacob Patterson <jacob.patterson.esq@gmail.com>  
**Sent:** Friday, February 7, 2025 1:11 PM  
**To:** CDD User  
**Cc:** Whippy, Isaac; Marie Jones  
**Subject:** Public Comment -- 2/12/25 PC Mtg., Item No. 6A, Parking Regulations

Planning Commission,

I may have misunderstood the direction of the three-to-two majority last time but I don't think it was to abandon changing our minimum parking requirements for residential development, only to NOT eliminate parking requirements for multi-family developments. (The other two of you were fine eliminating parking requirements altogether.) I still think we should change our minimum parking requirements for residential development rather than simply direct the Council to consider alternative ways to get the pro-housing designation points. We don't just want the bare minimum to get the designation, we actually want to reduce burdens and costs (like providing onsite parking) for residential development so we get more of it in Fort Bragg.

The relevant incentive City Council wanted to pursue is listed as 1F in the attachment.

***Pro-Housing Designation Incentive 1F, Minimum Parking:***

Eliminating minimum parking requirements for residential development as authorized by Government Code section 65852.2; adopting vehicular parking ratios that are less than the relevant ratio thresholds at subparagraphs (A), (B), and (C) of Gov. Code section 65915, subdivision (p)(1); **or** adopting maximum parking requirements at or less than ratios pursuant to Gov. Code section 65915, subdivision (p).

I had not read the relevant law last time but researched the actual statutory requirements that apply to this situation and we can still get the two points from this without eliminating parking requirements. Why not consider the other two methods to get the two points through reducing required parking to less than or equal to the ratios in California Government Code § 65915, subdivision (p)? Basically, we only need to make sure our minimum parking requirement ratios stay below the below ratios rather than eliminating them altogether.

We have two options: adopting ratios that are less than the thresholds set out in subdivision (p)(1) OR set ratios that are less than or equal to the ratios found throughout subdivision (p), which I pasted at the end of my comment. The relevant ratios in subdivision (p)(1) are as follows:

- (A) one bedroom or less = 1.0 parking spaces
- (B) two or three bedrooms = 1.5 parking spaces
- (C) four or more bedrooms = 2.5 parking spaces
- (D) student housing = no parking required

In my opinion, we should still eliminate all parking requirements except for multi-family residential and set the minimum parking requirements for multi-family at the same or lower than the ratios shown above.

Best regards,

--Jacob

**California Government Code § 65915, subdivision (p):**

**(p) (1)** Except as provided in paragraphs (2), (3), and (4), upon the request of the developer, a city, county, or city and county shall not require a vehicular parking ratio, inclusive of parking for persons with a disability and guests, of a development meeting the criteria of subdivisions (b) and (c), that exceeds the following ratios:

**(A)** Zero to one bedroom: one onsite parking space.

**(B)** Two to three bedrooms: one and one-half onsite parking spaces.

**(C)** Four and more bedrooms: two and one-half parking spaces.

**(D)** One bedspace in a student housing development: zero parking spaces.

(2) (A) Notwithstanding paragraph (1), if a development includes at least 20 percent low-income units for housing developments meeting the criteria of subparagraph (A) of paragraph (1) of subdivision (b) or at least 11 percent very low income units for housing developments meeting the criteria of subparagraph (B) of paragraph (1) of subdivision (b), is located within one-half mile of a major transit stop, and there is unobstructed access to the major transit stop from the development, then, upon the request of the developer, a city, county, or city and county shall not impose a vehicular parking ratio, inclusive of parking for persons with a disability and guests, that exceeds 0.5 spaces per unit. Notwithstanding paragraph (1), if a development includes at least 40 percent moderate-income units for housing developments meeting the criteria of subparagraph (D) of paragraph (1) of subdivision (b), is located within one-half mile of a major transit stop, as defined in subdivision (b) of Section 21155 of the Public Resources Code, and the residents of the development have unobstructed access to the major transit stop from the development then, upon the request of the developer, a city, county, or city and county shall not impose a vehicular parking ratio, inclusive of parking for persons with a disability and guests, that exceeds 0.5 spaces per bedroom.

(B) For purposes of this subdivision, "unobstructed access to the major transit stop" means a resident is able to access the major transit stop without encountering natural or constructed impediments. For purposes of this subparagraph, "natural or constructed impediments" includes, but is not limited to, freeways, rivers, mountains, and bodies of water, but does not include residential structures, shopping centers, parking lots, or rails used for transit.

(3) Notwithstanding paragraph (1), if a development meets the criteria of subparagraph (G) of paragraph (1) of subdivision (b), then, upon the request of the developer, a city, county, or city and county shall not impose vehicular parking standards if the development meets any of the following criteria:

(A) The development is located within one-half mile of a major transit stop and there is unobstructed access to the major transit stop from the development.

(B) The development is a for-rent housing development for individuals who are 55 years of age or older that complies with Sections 51.2 and 51.3 of the Civil Code and the development has either paratransit service or unobstructed access, within one-half mile, to fixed bus route service that operates at least eight times per day.

(C) The development is either a special needs housing development, as defined in Section 51312 of the Health and Safety Code, or a supportive housing development, as defined in

Section 50675.14 of the Health and Safety Code. A development that is a special needs housing development shall have either paratransit service or unobstructed access, within one-half mile, to fixed bus route service that operates at least eight times per day.

(4) If the total number of parking spaces required for a development is other than a whole number, the number shall be rounded up to the next whole number. For purposes of this subdivision, a development may provide onsite parking through tandem parking or uncovered parking, but not through onstreet parking.

(5) This subdivision shall apply to a development that meets the requirements of subdivisions (b) and (c), but only at the request of the applicant. An applicant may request parking incentives or concessions beyond those provided in this subdivision pursuant to subdivision (d).

(6) This subdivision does not preclude a city, county, or city and county from reducing or eliminating a parking requirement for development projects of any type in any location.

(7) Notwithstanding paragraphs (2) and (3), if a city, county, city and county, or an independent consultant has conducted an areawide or jurisdiction-wide parking study in the last seven years, then the city, county, or city and county may impose a higher vehicular parking ratio not to exceed the ratio described in paragraph (1), based upon substantial evidence found in the parking study, that includes, but is not limited to, an analysis of parking availability, differing levels of transit access, walkability access to transit services, the potential for shared parking, the effect of parking requirements on the cost of market-rate and subsidized developments, and the lower rates of car ownership for low-income and very low income individuals, including seniors and special needs individuals. The city, county, or city and county shall pay the costs of any new study. The city, county, or city and county shall make findings, based on a parking study completed in conformity with this paragraph, supporting the need for the higher parking ratio.

(8) A request pursuant to this subdivision shall neither reduce nor increase the number of incentives or concessions to which the applicant is entitled pursuant to subdivision (d).