

Memorandum

Date: December 17, 2021 (*revised 01-31-2022*)
To: Shellan Rodriguez, The Pacific Companies
From: Katy Cole and Angelica Rocha; Fehr & Peers
Subject: **The Parcel Parking Management Plan: Background Data and Document Review**

SD21-0421

The purpose of this memorandum is to determine if the proposed parking ratio for The Parcel (herein referred to as "the Project") is appropriate given research of other similar projects and compared to regulations allowed in other cities. This memorandum provides a summary of background data, parking research, and additional data to support the project team (The Pacific Companies and Town of Mammoth Lakes) in determining optimum parking supply for the project. We have provided a summary of industry trends related to parking for multi-family and affordable housing. In addition, we summarize findings from available parking survey research conducted on existing affordable housing units that suggest reduced parking ratios are warranted. Lastly, we provide a list of municipal codes parking requirements of similar jurisdictions to the Town of Mammoth Lakes ("TOML" or "the Town"). The findings presented will inform the development of parking demand reduction strategies and a parking monitoring program required as per the project's condition of approval.

Mobility Summary for the Proposed Project

The Parcel is a 25-acre undeveloped site on the west-end of Tavern Road between Manzanita Road, Center Street, and Laurel Mountain Road. The site has long been zoned for affordable housing and the proposed project is considered an urban-infill site according to Town standards.

The 2021 Parcel Master Plan was adopted by Town Council on December 9, 2020. The master plan includes the development of 580 permanently affordable housing units with a range of studio, 1-bedroom, 2-3 bedrooms, and 4+ bedrooms when complete. Phase I will include 81 units, with a unit mix of:



- 21 studios
- 18 1-bedrooms
- 21 2-bedrooms
- 21 3-bedroomroom.
- With eight to thirteen of Phase I's units reserved for formally homeless/people experiencing mental health issues.

The Town Council issued a condition of approval within Resolution NO. 21-10 for Phase I development which states:

Prior to the issuance of the first Certificate of Occupancy for a housing unit, the developer shall provide a parking management plan for final approval by the Town Council that demonstrates how alternative modes of transportation will reduce the parking needs for the project with consideration for the entire master planned area. Identified solutions shall be primarily derived from the Town's mobility planning efforts, including both accepted and adopted documents and should be in place prior to the issuance of the first Certificate of Occupancy. The parking management plan, that will be developed in coordination with the Town, should include clear metrics and triggers that allow additional parking to be provided for the project, with consideration for the master planned area, if the management plan does not achieve its goal. ¹

The proposed parking supply included in the master plan is less than the existing municipal code requirements. This is because the master plan permitting process enables projects to be approved with specific project criteria and variance from zoning code standards, including reduced parking requirements. According to the Municipal Code Section 17.44.030, affordable housing projects may comply with residential housing type requirements or consistent with the State Density Bonus Law, if requested by applicant. The project provides 100% affordable housing, further being able to utilize the California Density Bonus status. Parking requirements for the master plan, TOML Municipal Code, and the California Density Bonus Law are summarized in **Table 1** below. Parking calculations in **Table 1** that resulted in a decimal number, (e.g., 10.5 spaces) were rounded up. This is widely accepted as a parking industry norm.

¹ Town of Mammoth Lakes, Resolution 21-10, Exhibit B (2021)



Table 1: The Parcel Phase 1 Parking Requirements

Type	Project Unit Mix	Master Plan Ratio ¹	Master Plan Requirement	TOML Code Ratio ²	TOML Requirement	CA Density Bonus Maximum Ratio ³	CA Density Bonus Minimum Ratio ³
Studio	21	0.5 spaces	10.5 spaces	1 space	21 spaces	1 space	0 spaces
1-bedroom	18	1 space	18 spaces	1 space	18 spaces	1 space	0 spaces
2-bedroom	21	1.5 spaces	31.5 spaces	2 spaces	42 spaces	1.5 spaces	0 spaces
3-bedroom	21	1.5 spaces	31.5 spaces	2 spaces	42 spaces	1.5 spaces	0 spaces
Sub-total	81 units	92 spaces	92 spaces	123 spaces	123 spaces	102 spaces	0 spaces
Guest Parking	-	-	20 spaces*	2 spaces for each 4 units up to 12 units; 1 space for each 4 units for the 13th to the 48th units; 1 space for each additional 6 units above the 48th unit	18 spaces	Stated ratio is inclusive of disability and guest parking	Stated ratio is inclusive of disability and guest parking
Total Spaces Required	-	-	112 spaces	-	141 spaces	102 spaces	0 spaces

Notes: Data compiled by Fehr & Peers, 2021.

Sources:

¹ The 2021 Parcel Master Plan (2021)

² TOML Municipal Code Section 17.44.030 (2021)

³ Goetz, Jon and Sakai, Tom (2021) Guide to the California Density Bonus Law

*The 2021 Parcel Master Plan does not require guest parking, however, a minimum of twenty (20) on-street parking spaces are required for Development Area 1.

The Phase 1 Project is planning to construct 94 parking spaces on site with an additional 26 spaces on street for a total of 120. This includes two more on-site parking spaces and six more on street parking spaces than required as per the master plan. Sixty-nine parking spaces will be covered parking on site. Covered parking has an additional benefit because during the winter spaces are still accessible as opposed to becoming snow storage.

The proposed parking supply is aligned with the Town's multi-modal goals and is supported by robust access to key destinations (such as shopping and recreation) through multi-modal



transportation opportunities. The Town's *Walk, Bike, Ride Action Plan* (2017) outlines a plan to promote multi-modal connections from the Town Center and calls for a shift in single occupancy vehicle use. The project site is in the Town Center's Parking Zone 1, the area with highest concentration of multi-modal amenities and mixed-use development ([Municipal Code Section 17.44.030](#)). See **Figure 1** for information on accessible amenities within a half-mile and one-mile distance from the site. The master plan requires construction of additional sheltered transit stops. The first will be constructed as part of Phase 1 development.

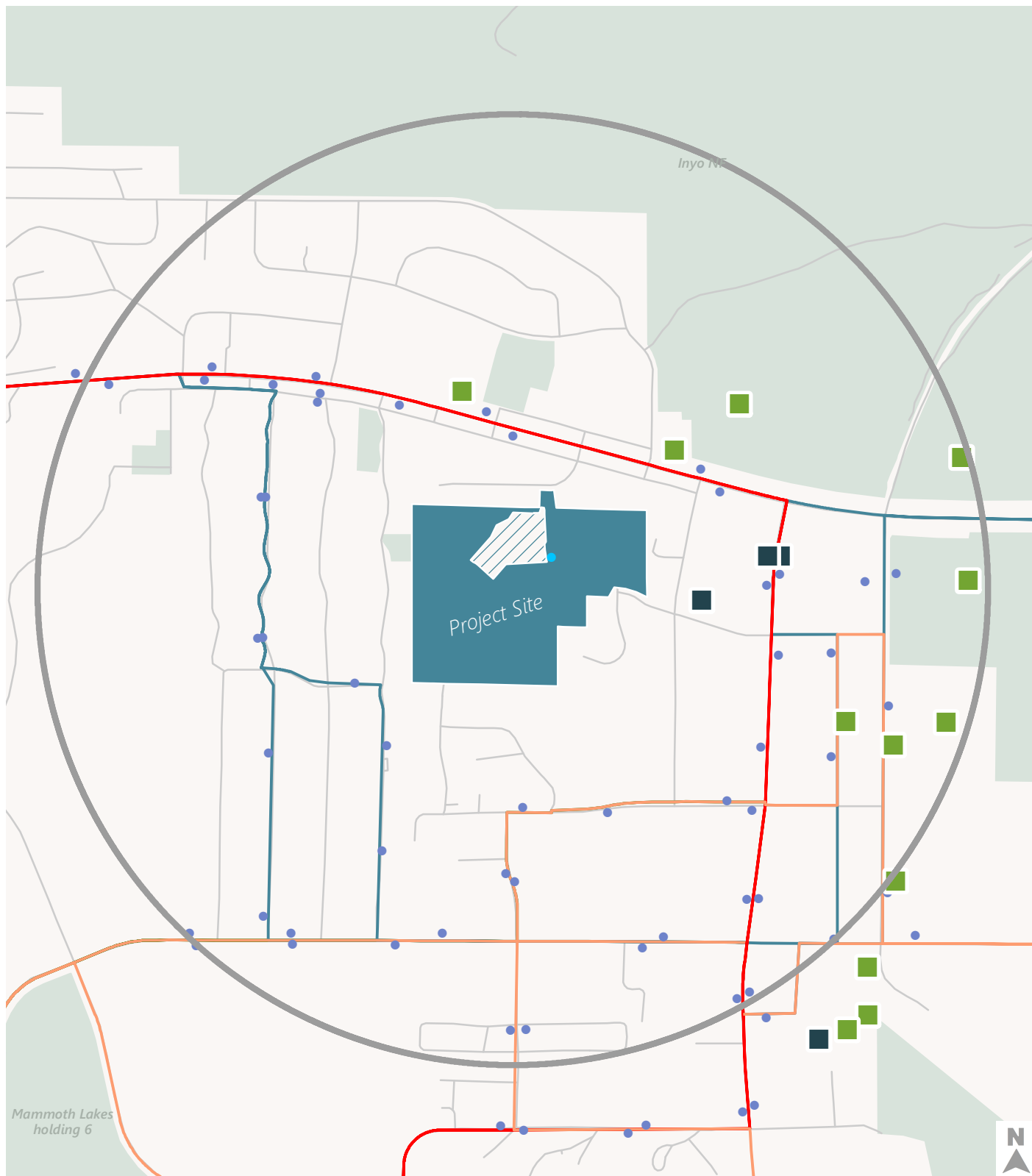
The Eastern Sierra Transit Authority operates free shuttles year-round that service the site. During the summer months, the site is served by both the Purple Line and Town Trolley. The site is served by the Red Line, Night Trolley, and Purple Line in the winter.

Purple Line Bus is a year-round service that provides robust service throughout the Town. The Purple Line operates seven days a week from 7:00 am to 6:00 pm with 30-minute frequencies. This route runs from Vons to The Village with stops by Mammoth Lakes Library, Cerro Coso Community College, the Hospital, the RV Park, and Mammoth Lakes Welcome Center.

Town Trolley operates a daily service from 9:00 am to 6:00 pm. The trolley operates on a 20-minute frequency from June to September and a 30-minute frequency operates from May to June and September to November. This Route goes from Canyon Blvd, across the Village to Lake Mary Road and Twin Lakes Loop.

Red Line Bus operates seven days a week from 7:00 am to 5:30 pm during the winter months of November to April. The bus travels via Old Mammoth Road and Main Street providing service between Snowcreek Athletic Club, The Village, and Mammoth Mountain Main Lodge. There are several transit stops accessible from the project site.

Evening and Late-Night Town Trolley operates seven nights a week from 5:40 pm to 2:00 am providing service from Canyon Lodge to The Village and through town along Main Street and Old Mammoth Road. The route operates on a 30-minute frequency. Return-only service available upon request after 10:00 pm to stops on Canyon Blvd, Lakeview Blvd, Meridian Blvd, and Juniper Springs Resort.



Legend

- | | | |
|------------------|----------------------------|--------------------------------|
| Half-mile buffer | Bus Stop (Phase I Planned) | Red Line |
| Grocery Store | Green Line | The Parcel - Phase I |
| Places | Midtown Lift | The Parcel - Full Project Site |
| Bus Stop | Old Mammoth Lift | |

Figure 1

Amenities within Half-Mile Radius of Project Site

The Parcel Parking Management Plan





Housing Development Parking Trends

Multi-Family Housing

Parking trends in multi-family housing development projects are emerging across the country to support local housing and climate goals. Many municipal code parking requirements are not updated regularly and do not reflect current parking and transportation needs. Often, uniform parking requirements across a jurisdiction do not allow projects to take considerations for parking design and supply requirements if the project is located near ample services/destinations and there are alternative modes to access those services/destinations. Building excess parking can greatly increase cost of construction and result in a cost burden to the resident. Significant national discussion has led to growing trends in policy. These policies include:

- **Reduced parking requirements** – When a City or Town revises parking requirements included in zoning code for a particular project or certain geographic area. It is widely accepted that reducing parking minimums promotes affordable housing development.² In fact, there are over 200 cities across the nation who recently issued parking reforms to reduce minimum requirements to promote development.
- **Unbundling parking from rent/unit cost** – Recent California State Senate Bill No. 7 (SB-7) moved the state to require unbundled parking in some of the largest multifamily housing projects.³ Unbundling the cost of parking from monthly rent is believed to reduce the per unit construction costs, reduce cost burden of non-vehicle owning households, and encourage residents to reduce car ownership. A study used to estimate the effect of unbundled residential parking found the odds of households with bundled parking living vehicle-free are 50–75 percent lower than the odds of households without bundled parking.⁴
- **Parking in-lieu fees** provide developers the option to pay a designated fee rather than provide some or all the required on-site parking spaces in the proposed projects zoning code. For example, the City of Chapel Hill requires no parking minimum on projects within the Town Center if the developer pays into the Town parking fund or presents an approved TDM plan.⁵ The fund is often used for transportation related enhancements or beautification efforts.
- **Active parking management** focuses on performance and utilization of existing facilities to ensure parking supply meets the demand. South Lake Tahoe allows for a 20% reduction of required parking spaces for multi-family housing projects if the property has

² Remy, Moose, and Manley LLP, *More California Cities Eliminate Parking Minimums to Promote Low Carbon Transportation and Affordable Housing (2021)* <https://www.rmmenvirolaw.com/more-california-cities-eliminate-parking-minimums-to-promote-low-carbon-transportation-and-affordable-housing/>

³ https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB7

⁴ Manville, Michael, (2017) Bundled parking and vehicle ownership: Evidence from the American Housing Survey.

⁵ Chapel Hill, NC Code of Ordinances, Section 5.9.2

https://library.municode.com/nc/chapel_hill/codes/code_of_ordinances?nodeId=CO_APXALAU5MA_ART5DEDEST_5.9PALO



a deed restriction making the property owner responsible for parking management (e.g., tenant not parking on unpaved areas, not parking in front of dumpsters, not parking on neighboring properties).⁶

Affordable Housing

Lower parking minimums on affordable dwelling units is used as a mechanism to promote more affordable housing stock. The California State Density Bonus Law requires affordable housing to have lower ratios than traditional multi-family housing parking requirements. This program provides developers with the tools to increase density and provide less parking in exchange for providing affordable housing. Without such provisions, it is widely understood that developers are disincentivized to build affordable housing because it is not profitable. A building with structured parking is estimated to cost \$50,000 per parking space.⁷ Costs are expected to be 15-25% higher in Mammoth, due to labor, weather, and proximity to materials. A result that leads to developers charging more per unit or building less affordable housing.⁸ In addition, low-income households have the lowest rate of single occupancy vehicle use and lower rates of vehicle ownership.⁹ Reducing the minimum parking requirements for affordable housing can increase availability of affordable housing stock on the market.

Parking Supply Outcomes

It is important to note that providing insufficient or excessive parking both result in undesired outcomes. The project team aimed at achieving a ratio that provides a balance between excessive and reduced parking supply to ensure the project meets the needs of the future residents. Below is a summary of outcomes related to excessive or reduced parking supply.

Outcomes of Excessive Parking Supply

- Increased Vehicle Miles Traveled (VMT)
- Increased air pollution and associated noise
- Encourage car ownership
- More land area and costs tied up in parking, which is not the highest and best use of land
- Higher development costs and rents as parking costs typically passed on to tenants
- Discourages active transportation
- Counter to Town's "feet first" moto

⁶ South Lake Tahoe, Title 6 Public Review Draft (August 2020)

https://www.cityofslt.us/DocumentCenter/View/14529/SLTODDS_Chapter-675-Public-Review-Draft_20200903?bidId=

⁷ Hoyt, Hannah and Schuetz, Jenny, (2020) *Parking requirements and foundations are driving up cost of multifamily housing*

⁸ Lehe, Lewis (2018) Minimum parking requirements and housing affordability, *Journal of Transport and Land Use*, Vol. 11 No. 1 pp. 1309-1321

⁹ FHWA NHTS Brief (2014) *Mobility Challenges for Households in Poverty* <https://nhts.ornl.gov/briefs/PovertyBrief.pdf>



- Driver frustration across all roadway user types (residents, visitors, and workers)
- Exacerbated traffic congestion

Outcomes of Reduced Parking Supply

- Conflict with surrounding property owners
- Difficult to lease
- High vacancy or turnover, thus devaluing the asset
- Unnecessary vehicular circulation to look for parking
- Additional staff hours for enforcing parking standards
- Resident dissatisfaction

Available Reports and Studies

While our project team is not aware of any affordable housing parking studies conducted in context sensitive locations to the TOML, the following section summarizes useful data on the available parking study research. These studies are largely completed in dense, urbanized communities; however, they are useful demonstrations for understanding trends in parking for affordable housing projects.

Los Angeles

In 2015, Fehr & Peers conducted a parking study of forty-two 100% affordable units inside and outside Transit Priority Areas (TPAs) in the City of Los Angeles. The findings demonstrated that the parking demand ratio of each site were lower than the required minimum in the City of Los Angeles' Municipal Code. In addition, the parking demand for family affordable housing ranged from 0.82 to 0.85 spaces per unit. To provide context, a TPA is typically defined as an area serviced by a transit route with a frequency of 15-minutes or less. Since the TOML does not have a typical TPA, a useful comparison is with the data on affordable family housing outside of TPA's. In Los Angeles, affordable housing units outside a TPA have an average supply of 1.17 spaces per unit and a peak demand of 0.82 spaces.

Palo Alto

Fehr & Peers performed a study to provide the City of Palo Alto with parking demand data on varying types of multi-family housing developments, (e.g., market rate, affordable, and senior housing) at varying distances to transit. The parking demand rate of surveyed affordable housing units was approximately 0.55 spaces per bedroom and proximity to transit in some cases reduced the parking demand by approximately 25 percent.



San Diego

The City of San Diego conducted a parking study on twenty-one affordable housing sites in the City of San Diego in 2011. The study concluded that parking demand for affordable housing projects is about one half of typical rental units in San Diego and almost half of all units surveyed had no vehicle. Transit access ranged across the sample; however, parking demand was associated with larger unit size and higher income levels of affordability.

Context Sensitive Comparisons

The following section outlines municipal parking supply requirements for several jurisdictions of similar size and context to the TOML. This information is intended to support the approved deviation from Town's the existing municipal code. **Table 2** provides an overview of parking policy of multi-family housing and affordable housing (if provided). The list is comprised of nationwide mountain communities and small towns and cities. **Table 3** compares The Project to another affordable housing project in the TOML.



Table 2: Comparable Cities Municipal Parking Supply Requirements

Jurisdiction	Population	Minimum Parking Supply Requirement
<i>Parcel Master Plan (Mammoth Lakes, CA)</i>	n/a	0.5 spaces per studio, 1 space for 1 bedroom, 2 spaces for 2 and 3-bedroom (Requirements in The Parcel Master Plan, 2021).
<i>South Lake Tahoe, CA</i>	21,939	1 space per Studio or one-bedroom units and 2 spaces per two or more-bedroom units. ¹
<i>Truckee, CA</i>	16,474	1.5 spaces per 1 bedroom unit with 1 space per unit in a fully enclosed garage and 2 spaces per 2 or more bedrooms. ²
<i>Aspen, CO</i>	7,431	1 space per Dwelling unit. ³
<i>Telluride, CO</i>	1,965	1 space per dwelling unit. ⁴
<i>Ketchum, ID</i>	2,855	0 spaces required for units <750 sq/ft, 1 space for units 751-2,000 sq/ft, and 2 spaces for units 2,001 sq/ft and above in the Community Core and Tourist Zone Districts. ⁵
<i>Sandpoint, ID</i>	8,931	0 spaces required in Downtown Core, and 20% reduction to multi-family housing ratios for affordable housing development. Standard housing ratio includes 1 space for multi-family dwelling <1,200 sq/ft and 1.4 units for dwellings >1,200 sq/ft. ⁶
<i>Chapel Hill, NC</i>	64,051	0 spaces required within Town Center Zone Districts. Maximums include 1 per Studio or 1-bedroom, 1 unit per 2-bedroom, 1.5 units per 3-bedroom.
<i>Vinton, VA</i>	8,104	0 spaces required in central business district. ⁷

Notes: Data compiled by Fehr & Peers, 2021.

Sources:

¹ South Lake Tahoe, Title 6 Public Review Draft (August 2020)

² Truckee Municipal Code – Title 18, Development Code, Section 18.48.040

³ City of Aspen, Ordinance No. 13 (2019)

⁴ Telluride, Municipal Code, Section 3-108

⁵ Ketchum, Idaho Municipal Code, Section 17.125.040

⁶ Sandpoint, Idaho Municipal Code, Title 9, Section 9-5-3

⁷ Vinton, Virginia Municipal Code, Article 5, Division 6, Section 5-30



Another consideration further warranting The Project's lower number of parking spaces is the smaller unit mix. **Table 3** compares The Project to Aspen Village, another The Pacific Companies project. Smaller sized units lend themselves to less people per household and less parking spaces needed per unit.

Table 3: Affordable Housing Project Comparison

	Aspen Village ¹	The Parcel – Phase I ²
Studio	0 units	21 units
1-bedroom	0 units	18 units
2-bedroom	24 units	21 units
3-bedroom	24 units	21 units
Total # of Units	48 units	82 units
Total # of Parking Spaces	74 spaces	112 spaces
Size of Site (aces)	4.87 acres	2.18 acres
Parking Ratio	1.5	1.4
Covered Parking	No	Yes

Notes: Data compiled by Fehr & Peers, 2021.

Sources:

¹ The Pacific Companies

² The 2021 Parcel Master Plan (2021)



Conclusion

After a careful review of the context, location, and project type, our research indicates that the proposed parking supply is consistent with parking experiences of similar uses in other communities in similar context. Research demonstrates a growing trend in providing developers a toolbox of strategies to reduce car dependency and the number of required parking spaces needed on a project. Over 200 jurisdictions have implemented some form of policy reform for providing a parking ratio like the proposed project. Therefore, we believe the project team has ample evidence to demonstrate the proposed parking supply will fit the needs of the community. The project team is encouraged to implement additional strategies for managing parking demand and encouraging alternative modes.