



living streets alliance

The mission of Living Streets Alliance is to advocate for a thriving Tucson by creating great streets for all of us.

March 02, 2022

RE: **Commercial Parking Amendments UDC Text Amendments**

Dear members of the Planning Commission,

I am writing today, on behalf of Living Street Alliance, to express our support for the proposed Unified Development Code (UDC) Amendment related to Commercial Parking Requirements. We believe that allowing a mechanism for reduced parking requirements to support affordable housing and to facilitate outdoor seating for commercial establishments would be beneficial in several ways.

Parking spaces are expensive to build and parking can be a significant part of the project costs for multi-family housing developments. Currently, the UDC parking requirements make no distinction between affordable and market-rate multi-family housing developments, despite evidence that parking demand is lower for affordable housing projects. Minimum parking requirements applied evenly across the board are regressive and inequitable as parking costs are often passed on to the occupants and lower income households may end up paying a greater share of their rent to cover these costs despite owning fewer vehicles. In the absence of by-right reduction of parking requirements for affordable housing developments, or an elimination of parking minimums altogether, Individual Parking Plan (IPP) can serve as a tool to right-size parking needs on a case-by-case basis while reducing development costs for affordable housing projects. We are also excited about extending the IPP option to restaurants and bars because this tool would create opportunities for repurposing portions of surface parking lots for more vibrant, active, and people-friendly uses. Outdoor seating is an essential element of lively and inviting streetscapes, and while our work is mainly focused on public spaces such as streets, public plazas or parklets, we do recognize that private spaces adjacent to streets help define the quality of our streetscapes. IPP can facilitate creating more vibrant transitional zones between public and private spaces and reclaiming space for people in traditionally car-centric land uses.

Evidence from cities across the country and around the world shows that parking supply is one of the strongest predictors of parking demand. Oversupplying parking often results in increased traffic and adverse environmental and climate outcomes. We understand that right-sizing parking is a complex task and will require a more comprehensive overhaul of our parking minimums and adopting additional transportation demand strategies. Therefore, we encourage the City of Tucson to explore more substantial code changes to create meaningful reductions in parking requirements as a way to disincentivize a heavy reliance on single-occupancy vehicle trips, and express our support for the current code amendment as an interim, smaller step in that direction.

Sincerely,

Emily Yetman
Executive Director
Living Streets Alliance