HAYWARD AREA PLANNING ASSOCIATION

December 3, 2008

Rob DuVall,
Climate Change Planning Section
CARB
1001 I St./ PO Box 2815
Sacramento CA 95812

Re: **Public Subsidies for Parking Structures**

Dear Mr. DuVall:

I am concerned that state agencies are creating problems for regional and local efforts to reduce global warming gases. The CSU system has a pattern of charging more for surface parking to build parking structures. These structures could not pay their way if they had to charge the user for their real cost. The Education Code allows the Trustees to use parking charges to pay for alternative transportation.

In the case of CSU East Bay Hayward, the administration has a plan to build five structures with 5,000 spaces, all subsidized by surface parking. My research shows, for example, that the need for the first structure of 1,100 spaces could be met by a rapid bus shuttle between Hayward BART and the campus, and that the cost would be lower than for a structure. Such an approach would also reduce congestion on Hayward streets and support transit-based development along the route.

Doug Kimsey of MTC gave me a copy of his letter to you of Nov. 19, 2008. I am following up. The City of Hayward also is developing a Climate Action Plan, whose success, in part, depends on a state agency not sabotaging its efforts to reduce VMT.

I suggest a state policy to the effect that
>Public subsidies to parking structures encourage more driving and more carbon emissions. Any place attracting enough trips for a parking structure also can be served by transit. Therefor the State of California opposes / discourages state and local governments from building subsidized parking structures and recommends using transit for access.

Are you the right person to contact to get the ball rolling? I looked at the organization chart at http://www.arb.ca.gov/cc/contacts/occ_org_contacts.pdf. Please write or email me at sherman@csuhayward.us

Sincerely,

Sherman Lewis

Sherman Lewis, President
Hayward Area Planning Association
2787 Hillcrest Ave.
Hayward CA 94542
510-538-3692; sherman@quarryvillage.us

Additional background

Rapid bus would be faster than car travel based on number of innovations to speed the service (details available on request). With rapid bus, they could continue to pay a parking fee, or they could ride the bus free of charge (class pass). Students would be able to park their cars at park-and-ride lots close to the campus. Bus service would be every five minutes or more frequent.

The administration is doing an EIR on a parking structure which will probably have to be cross-subsidized by parking fees from surface parking. Those same fees could be used for transit, and at a much lower cost per trip. A parking structure for 1,100 spaces would cost about $15 per space per work day. A 6 bus transit system would cost about $1.40 per round trip rider. (Spreadsheet financial analyses sent on request.)

Campuses are ideal locations for transit access; they cover a relatively small area with a dense population of mostly younger, healthy people. CSUEB Hayward can grow based on more parking strictures and more traffic to campus, or based on transit. Transit also saves land for residences, class rooms, and recreational green space.

Whenever a parking structure is built, it attracts traffic relative to a transit solution. This traffic adds to congestion and preempts road space needed for development not feasibly served by transit. The City of Hayward is planning for several hundred acres of land surplus from a proposed, now defunct, freeway. Some development of this 238 corridor will be car-dependent, and some can use transit. If CSUEB Hayward works with the City of Hayward, more 238 surplus land development cold be transit based. But with parking structures, the university preempts road space needed for redevelopment and increases congestion, reducing access to the campus itself.

The State of California has just begun the process of planning for decarbonization. In October the Air Resource Board released the Final Scoping Plan to meet the goals of AB 32. Now it is appropriate for the state to get more specific and, among other things, oppose public subsidies for parking structures.

It is increasingly urgent that human society deal with global warming. The costs to date are already high in weather damage, permanent loss of land to higher sea levels, extensive decline of species, depleting oil resources, health and safety costs, economic inefficiency due to environmental externalities, and military costs. Carbon is building up faster than previously predicted. Little real progress has been made. Yet under duress of higher prices California drivers dramatically lowered gasoline purchases in a short span of time . We have the ability to change, but so far we lack the will.

References:

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Donald Shoup, "The Trouble With Minimum Parking Requirements," December, 1999, http://www.vtpi.org/shoup.pdf

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Todd Litman, ."5.4 Parking," *Transportation Cost and Benefit Analysis – Parking Costs,* http://www.vtpi.org/tca/tca0504.pdf

Sierra Club, America's Auto on Welfare, Summary of Subsidies, http://www.sierraclub.org/sprawl/articles/subsidies.asp