

October 17, 2022

Dear City Council members:

I write regarding DSRFY2022-0014, the Sonder building. I own a house on 34th street, where my father-in-law lives. I am in favor of increasing densification in Garden City, and I have not opposed the many other large developments around my property. But this proposal flouts the rules for parking, using up the community's street parking while reaping the financial rewards of reduced building costs for developers. That community parking, on the street and in city-funded lots, should go to *community* uses, like parking for access to the Greenbelt and the farmers' market. It should not be disproportionately allocated to a single private development.

The alternative is troubling: the earliest movers in densifying Garden City are allowed to build without following the rules, until one day there is not enough street parking. At that point, everyone else suffers: future buildings must be held to a different standard, and community members cannot park to access the neighborhood's businesses and the Greenbelt. But there is no undoing the exception granted to a building like the Sonder; once it is built, its developers will never have to reckon with these long-term problems. Confronted with these problems at the design review public hearings, the representative for the Sonder made a telling suggestion: when the street parking one day runs out, *the city can pay to build parking lots*. In other words, the developers can profit from building a larger building now without adequate parking, and when the problem comes home to roost years from now, when enough buildings are built that street parking becomes scarce, it will be the taxpayers and residents of Garden City who have to pay. That is not equitable.

Let's look at the specifics. **The Sonder includes 15 apartments, 7 offices, and a retail space (likely a coffee shop). The developers propose, in total, 17 parking spaces, all of which will be available exclusively to the building's residents, behind a security gate.** The below chart summarizes the requirements under Garden City code for these spaces, the Sonder's proposal, and the justification the Sonder developers have provided to deviate from the rules:

<u>Portion of development</u>	<u>Requirement under Garden City code</u>	<u>Proposal</u>	<u>Justification for deviation from rules</u>
15 apartments 10 studio/1-bed; 4 2-bed; 1 3-bed	20 spaces	16 spaces + 1 shared car	Shared car will reduce car ownership to 1 per household, maximum
Guests at apartments	8 spaces	0 spaces	Guests can park in city lots or on the street
7 offices and a ground-floor retail space (coffee shop) – total 3505 sq. ft.	11 spaces	0 spaces	Office holders may live in apartments The Live Work Overlay District does not require parking for offices below 500 sq. ft.
TOTAL	39 spaces	17 spaces: only 43.5% of required	

This is not a small deviation from the parking requirements: the Sonder provides **less than half the required parking under code.** And each of the Sonder's justifications to be excepted from the rules fails.

A. The Apartments

The sole justification to deviate from normal residential parking requirements is access to a shared car, furnished by the apartment building. There are a number of problems with the shared car proposal that have never been addressed.

Some of these problems are practical. How will it work to have a car shared by the building's residents? Who will own it, maintain it, insure it, clean it, store the keys to drive it? As just one concrete question, is it even possible to buy an insurance policy to cover all the residents of the building as potential drivers? I have been asking this question for months, but I have never heard an answer. I appreciate the novelty of the Sonder's shared car idea, but novel ideas must be adequately probed for their practical viability. Moreover, if the family developing this building moves away or decides they don't want to organize the carshare anymore, does the city have any recourse to require the program to continue, or will we simply be left with a building with inadequate parking and no remediation measures?

And in any event, the carshare cannot come close to addressing the full 22 missing parking spaces. The car share does nothing to reduce the parking needs of guests and customers of the offices and coffee shop—all people who need parking but will have no access to the shared car. Even if we made the laughable assumption that all fifteen households in the building will share one single car, with no one owning a single private vehicle, just the needs for the *commercial* and guest uses of the building exceed the parking provided in the plan (those needs alone would total 19 spaces).

The only evidence that the developers have mentioned to support the carsharing program is a study from San Francisco mentioned at a design review hearing, which supposedly shows that average car ownership per household decreases from 0.47 to 0.24 with access to a shared car. I searched for this study, and I placed it in the record before the design review committee. It does not study the reduction in car ownership when a shared car is offered in a building; it studies the reduction in car ownership among people who *choose to join and pay for a membership in a carsharing service* (like Zipcar). It stands to reason that people would not make this choice unless they expected to use the shared car and save money by not needing a personal car. But when people are opted into carsharing automatically by virtue of living in a building, there is no reason to believe they have the same commitment to selling their car. They might just like the apartment for many other possible reasons. There is no study in the record to suggest that merely offering a joint car in an apartment building reduces car ownership *at all*. And there is no evidence at all about the effects of carsharing on car ownership in less-dense areas like Garden City. The average household in the Boise area has 1.7 cars, and less than 5% of households are entirely car-free, compared to approximately 30% of households without cars

in San Francisco, where the study was conducted.¹ And even if you credit the San Francisco study despite all of those distinctions, at *best* it suggests carsharing reduces car ownership by about 50%--which would only reduce the need for resident parking from 20 spaces to 10, leaving the building overall still 12 spaces short of normal requirements!

B. The Guests

The Sonder, by its own admission, provides no excess parking for guests. All the spaces will be used up by the residents of the building (1 car per apartment), the shared car, and a handicapped-accessible spot. All guests will have to park on the street.

The Sonder's exclusive reliance on street parking for guests is not reasonable. The Sonder's justification would apply to *every* development in Garden City, vitiating the code's parking requirements. After all, everyone would prefer to use the street parking for *their own* building and make *other people* spend money building private parking. That's why we have rules to fix that collective action problem. There is nothing unique about the guest parking needs of the Sonder that justifies completely waiving those rules in this case.

Further, there is already inadequate street parking in the area: other residents submitted photos to the design review committee showing that the streets are often full. And that is before the many active development projects are finished. You are being asked to decide about a permanent building based on a snapshot in time of the neighborhood's available parking. The relevant consideration is the long-term parking availability—because once this building is approved and the developers turn their profit, the chance to force them to share proportionately in the cost of the neighborhood's parking needs is lost forever. Right now, many of the lots in the neighborhood are vacant. But they are vacant in preparation for major new construction. Any empty streets will not stay that way for long.

C. The Offices and Retail

Finally, the Sonder contains no parking at all for its 3500+ square feet of retail and office space. The developers suggest that the offices may be used by residents of the building. But tellingly, they won't commit to renting the offices *only* to building residents, which they could easily do if they actually intended to be bound by that limitation. Why? As their own application letter states, they want to retain "flexibility" about who uses the offices—which is to say, they will not limit the renter pool to the residents of the building. There is no reason to believe the offices will be rented exclusively to residents, and the city will have no recourse if it approves the project with no conditions attached to the offices and the developers then use their "flexibility" to rent the offices to whomever they chose.

The developers' only other justification is that they would not have to provide parking for the commercial spaces under the Live Work Overlay District rules. But the Live Work Overlay rules apply *only to shorter buildings*, and this application was not submitted under those rules.

¹ See report from Vanderbilt University at <https://my.vanderbilt.edu/greencities/files/2019/10/Vehicle-Ownership-in-U.S-2016.pdf>.

The Sonder wants to have it both ways: build a taller building by opting out of the Live Work Overlay District, but avoid parking restrictions by demanding to be treated as though it complied with the Live Work restrictions. The rules for the district work in concert with each other; it makes sense to waive parking requirements for smaller buildings, while still applying them to taller ones that have more significant aggregate parking needs. If the Sonder developers wish to invoke the benefits of the Live Work Overlay District, they must also live with its limitations.

In conclusion, I care about parking because I believe it creates the vibrant neighborhood that the Sonder's developers claim they want, too. Without parking, there is no room for people who want to visit the area to walk to the Greenbelt or go to the farmer's market or eat at the neighborhood's restaurants. A neighborhood without adequate parking results in the *opposite* of the supposed vision of this development: a warren of apartment buildings whose residents spill out to fill up the streets, leaving no extra parking to support recreational and commercial uses.

That shortage of parking doesn't happen all at once; it happens building by building when each new development falls even a bit short of its needs. But in aggregate, the results will be severe, and once the buildings are constructed, it's a very hard problem to solve. I want to see Garden City grow. I ask only that each new development is held to the same equitable standard and forced to contribute its share of the neighborhood's needed parking to ensure healthy, fair, long-term growth.

Thank you for your consideration,

/s/ Kate Falkenstien