Fehr & Peers

Memo

Date: March 6, 2026

To: Jennifer Liu, MidPen Housing

From: Chris Abeel, Franziska Church, AICP, Fehr & Peers

Subject: Parking Supply Assessment Memorandum for the 1171 Sonora Court Affordable Housing Project

---

This memorandum documents the parking assessment for the proposed multifamily residential development ("Project") at 1171 Sonora Court in Sunnyvale, California. The Project would construct a seven-story, 172-unit affordable residential development and proposes to provide on-site parking at a ratio below the parking requirements otherwise established by the City of Sunnyvale and the Lawrence Station Area Plan. Because the Project is located within one-half mile of Lawrence Caltrain Station, it qualifies for the parking provisions of California Assembly Bill 2097 (AB 2097), which limits the City's ability to impose minimum residential parking requirements for this site.

The purpose of this memorandum is to assess whether the Project's proposed parking supply is sufficient for this site. To do so, the memorandum describes the Project and surrounding demographic context, reviews applicable state law and local parking regulations, and evaluates the proposed supply using Institute of Transportation Engineers (ITE) Parking Generation estimates, South Bay affordable housing precedent, and qualitative evidence. Together, these lines of evidence are used to determine whether the proposed parking supply is operationally appropriate for the Project.

Project Description

The Project would replace an existing office building with a seven-story, 100 percent affordable multifamily residential development consisting of 170 deed-restricted affordable rental units and two on-site manager's units, for a total of 172 residential units. The Project site is located on Sonora Court, within the Lawrence Station Area Plan area of Sunnyvale. The site is accessed by Sonora Court and connects directly via San Zeno Way to Kifer Road just west of the Kifer Road/Lawrence Expressway intersection.

Multiple transit services are located within one-half mile of the Project site. The Lawrence Caltrain Station, located within one-half mile of the Project site, provides regional commuter rail service along the Peninsula Corridor. The station is served by Caltrain local service, offering frequent weekday and weekend trains between San Francisco and Gilroy with connections to major employment centers including Mountain View, Palo Alto, and Downtown San Jose. Local bus service is also available near the Project via Santa Clara Valley Transportation Authority (VTA) Route 21, which operates along El

Camino Real and connects Sunnyvale to Santa Clara, Palo Alto, and other destinations along the corridor. The nearest stops are the eastbound stop at Reed Avenue and Lawrence Expressway and the westbound stop at Reed Avenue and Willow Avenue, both located approximately 0.5 miles south of the Project site. The area is also served by employer-based commuter shuttles, including the ACE Gray Shuttle, which provides connections to the Great America Amtrak Station and nearby employment campuses, serving stops along Kifer Road.

Table 1 below summarizes the proposed residential unit program and associated parking supply.

Table 1: Proposed Affordable Unit Program and Parking Summary

Category	Unit Type / Stall Type	Quantity	Mix	Parking Ratio	Parking Provided
Affordable Units	Studios	27	15.9%	0.5	13.5
Affordable Units	1-Bedroom Units	57	33.5%	0.5	28.5
Affordable Units	2-Bedroom Units	43	25.3%	0.5	21.5
Affordable Units	3-Bedroom Units	43	25.3%	0.5	21.5
Subtotal	**Total Affordable Units**	**170**	**100%**	**0.5**	**85.0**
Additional Stalls	Manager Units	2	–	1.0	2
Additional Stalls	Service Vehicle Stall	1 stall	–	–	1
Total Proposed Supply	**All Parking Stalls**	—	—	—	**88**

Source: Fehr & Peers, 2026.

The current design also includes 110 Class I indoor bicycle parking spaces and 12 Class II secure parking spaces, for a total bike parking supply of 122. In addition, Sunnyvale's 2020 Active Transportation Plan identifies a future bicycle lane along Sonora Court intended to improve bicycle access to the Project site and strengthen connections to Lawrence Caltrain Station and the planned Kifer Road-Sonora Court bicycle and pedestrian network within the Lawrence Station Area. The City proposed bike lanes on Sonora Court may reduce on-street parking supply when implemented.

Demographic Context

The local context surrounding the Project site reflects demographic and travel characteristics that support the Project's reduced parking approach, including lower vehicle ownership rates and established multimodal travel patterns. Within one-half mile of the Project site, the area exhibits multimodal travel characteristics, including approximately 8 percent car-free households, nearly 7 percent transit commute share, and fewer than half of workers driving alone to work.

As shown in **Table 2**, the half-mile project area is characterized by relatively low vehicle ownership, moderate transit use, and income levels commonly associated with reduced automobile

dependence[1]. Approximately 5.2 percent of residents live below the federal poverty level, and roughly 9.1 percent live within 200 percent of the poverty threshold. 8.5 percent of households do not own a vehicle, and 42.8 percent of households own only one vehicle, indicating comparatively low auto ownership in the surrounding area. In addition, only 49.5 percent of workers drive alone to work, while approximately 6.8 percent commute by public transit and 8.3 percent carpool, reflecting an existing multimodal travel pattern. These characteristics are consistent with a transit-supportive context in which automobile ownership and reliance are lower than suburban norms.

Table 2: Demographic and Travel Characteristics within 0.5 Miles of the Project

Category	Metric	Value
Population & Employment	Population	~6,300 persons
	Jobs	~6,200 jobs
Income Characteristics	Population below poverty level	5.2%
	Population within 200% of poverty threshold	9.1%
Vehicle Ownership	Households with no vehicle	8.5%
	Households with one vehicle	42.8%
Commute Mode Share	Drive alone	49.5%
	Public transit	6.8%
	Carpool	8.3%

Source: U.S. Census Bureau, American Community Survey 5-Year Estimates (2019–2023); 2020 Decennial Census; Longitudinal Employer-Household Dynamics (LEHD). Fehr & Peers, 2026.

Taken together, these data indicate that the Project site is located within an area characterized by moderate auto ownership, established transit use, and income levels that support reduced parking demand. The proposed affordable, transit-oriented development (TOD) is therefore aligned with the existing demographic and travel patterns of the surrounding community and supports a reduced residential parking supply.

Applicable Law and Policy Framework

AB 2097 Overview

AB 2097, effective January 1, 2023, prohibits public agencies from imposing minimum automobile parking requirements on development projects located within one-half mile of a major transit stop. The statute was enacted to promote housing production, reduce development costs, and support greenhouse gas reduction goals. Assembly Bill 2553 (AB 2553), effective January 1, 2025, broadened the definition of a major transit stop by adjusting qualifying bus headways to 20 minutes or less

[1] U.S. Department of Transportation, Bureau of Transportation Statistics, *The Household Cost of Transportation: Is it Affordable?*, report showing that in 2022 "households in the lowest income quintile owned the fewest number of vehicles on average (1.0 vehicle per household) and a larger share did not own or lease a vehicle (30 % of low-income households had no vehicle compared to 3 % of households with income above roughly $245,000)."

during peak periods. Under AB 2097, a jurisdiction may re-impose parking minimums only through written findings demonstrating a substantially negative impact. However, this exception does not apply to housing projects that include at least 20 percent lower-income units, among other specified housing types.

The Project is located within one-half mile of the Lawrence Caltrain Station, which qualifies as a major transit stop under state law, and consists of 100 percent affordable housing. Accordingly, the City is prohibited from imposing any minimum automobile parking requirement on the Project. The proposed provision of 88 parking spaces therefore exceeds the minimum parking required under state law.

Sunnyvale Municipal Parking Requirements

The City of Sunnyvale's standard municipal code parking requirements include provisions for "special housing developments," defined to include affordable housing developments for lower income households, senior citizen housing, and housing for persons with disabilities. Special housing developments must provide spaces in accordance with *§19.46.080* unless exempted by other provisions and may request a reduction through the City's parking adjustment process.

Table 3 summarizes the City's minimum parking requirements for affordable housing to lower income households. These ratios exceed the 0.5 spaces per unit proposed for the Project. However, because the Project is located within the Lawrence Station Area Plan (LSAP district), these citywide requirements do not apply. Instead, projects within the LSAP district are generally subject to the LSAP district's parking provisions.

Table 3: Sunnyvale Affordable Housing Minimum Parking Requirements

Type of Housing	Type of Unit	Required Parking Spaces
Affordable to lower income households	One-bedroom	1 space per unit
	2 or 3 bedrooms	2 spaces per unit
	4 or more bedrooms	2.15 spaces per unit
	Unit of any size for senior citizens or persons with disabilities	0.6 spaces per unit

Source: City of Sunnyvale Municipal Code, §19.46.080, (2025)

Lawrence Station Area Plan District Parking Standards

Within the Lawrence Station Area Plan, the City of Sunnyvale Municipal Code establishes parking requirements based on unit type and bedroom count. The code describes the Lawrence Station Area Plan as a specific plan intended to encourage higher-intensity development adjacent to public transportation and to promote alternatives to single-occupancy vehicle travel, with the purpose explicitly tied to reducing vehicle miles traveled and associated greenhouse gas impacts.

The Lawrence Station Area Plan district code lists minimum and maximum vehicle parking requirements in LSAP district code §19.35.080A, which are summarized in **Table 4** below. For general

residential uses, minimums are 1.0 space per studio or one-bedroom unit, 1.25 spaces per two-bedroom unit, and 1.7 spaces per three-plus bedroom unit. For deed-restricted affordable housing, the code specifies that the parking requirement is calculated by multiplying each bedroom requirement by 0.5.

Table 4: LSAP Off-Street Vehicle Parking Space Requirements

Land Use Category	Minimum (per unit)
Studio and one-bedroom	1.0
Two-bedroom	1.25
Three+ bedrooms	1.7
Senior housing	Multiply bedroom requirement by 0.5
Affordable housing (deed restriction)	**Multiply bedroom requirement by 0.5**

Source: City of Sunnyvale Zoning Code, § 19.35.080 – Parking standards. (2025)

Applying these ratios to the Project's 170-unit affordable housing program results in the minimum parking requirement summarized in **Table 5** below.

Table 5: Lawrence Station Area Plan Minimum Parking Requirement (Affordable Housing)

Proposed Unit Mix	Proposed Quantity	LSAP Requirement	Required Parking Spaces
Studios	27	0.5 spaces per unit	13.5
1-Bedroom Units	57	0.5 spaces per unit	28.5
2-Bedroom Units	43	0.63 spaces per unit	26.9
3-Bedroom Units	43	0.85 spaces per unit	36.6
Manager Units[1]	2	0.63 spaces per unit	1.26
Total	**172 Units**	—	**107 Spaces**

Notes: 1. Manager Units are proposed to be 2-Bedroom Units.
Source: Fehr & Peer, 2026.

Based on the proposed unit mix, application of City parking requirements for the Lawrence Station Area Plan would result in approximately 107 required parking spaces.

Considering the parking requirements of both the Lawrence Station Area Plan and the affordable housing arrangement, the proposed parking supply of 88 parking spaces is shy of the city required parking minimum by approximately 17.5 percent or about 19 spaces. However, the Project qualifies for relief from these minimum requirements under AB 2097 and current City standards, development projects located within one-half mile of a major transit stop are not required to comply with minimum parking requirements.[2]

[2] The Lawrence Station Area Plan District code also notes that parking locations, types, and criteria for parking reductions will be determined through project review on a case-by-case basis. This suggests local discretion in the design and management of parking supply, subject to state preemption limits discussed below.

ITE Parking Generation Analysis

The Institute of Transportation Engineers' (ITE) *Parking Generation Manual, 6th Edition*, provides a national compilation of peak parking demand data. The *Parking Generation Manual, 6th Edition* was used to evaluate the anticipated parking demand associated with the proposed development. ITE parking demand calculations were based on two study sites applicable to the Project's land use and development program. The analysis focused on estimating peak parking demand to assess the adequacy of the proposed parking supply.

Fehr & Peers utilized parking demand rates from the ITE *Parking Generation Manual, 6th Edition* for Affordable Housing – Income Limits (Land Use Code 223). According to ITE, this land use includes multifamily housing rented at below-market rates to households that include at least one employed member. The data for this land use category represent sites with income restrictions for tenants. Land Use Code 223 in a General Urban/Suburban setting was used to evaluate parking demand for the Project.

The average weekday peak parking demand for Land Use Code 223 is 86 percent as shown in **Table 6**. The max AM and PM occupancy are at 5:00 AM and 10:00 PM when residents are not commuting. Similar occupancy rates may be observed at the Project site. The parking supply at these sites included in ITE's data ranged from 0.32 to 1.66 parking stalls per dwelling unit, with an average parking ratio of 1.00 stall per dwelling unit. This range reflects variability in site context, transit access, and resident characteristics across the surveyed developments. The Project's proposed parking ratio of 0.5 stalls per dwelling unit falls within the observed range for similar land uses, though below the average rate of 1.00 stall per dwelling unit.

Table 6: Time of Day Distribution for Parking Demand

Hour Beginning	Percent of Weekday Peak Parking Demand Occupancy of Spaces at Income Limited Housing Sites
5:00 AM	100%
6:00 AM	94%
7:00 AM	85%
8:00 AM	77%
9:00 AM	73%
10:00 AM	71%
Average AM	***83%***
6:00 PM	79%
7:00 PM	83%
8:00 PM	90%
9:00 PM	93%
10:00 PM	97%
Average PM	***88%***
Average Daily	***86%***

Source: ITE Parking Generation Manual 6th Edition, 2023.

Local Precedent and Qualitative Evidence

Local precedent and recent research on the relationship between parking requirements and transit-oriented developments provide practical benchmarks for assessing whether the proposed parking supply is reasonable in a transit-oriented setting.

Local Precedent

The Project's proposed 0.50 parking ratio should be evaluated in the context of how comparable affordable housing developments near transit are performing. Across Sunnyvale and the South Bay, recent 100 percent affordable projects in transit-accessible locations have been developed with reduced parking ratios, reflecting lower vehicle ownership and evolving policy direction.

Table 7 below summarizes 11 South Bay affordable housing projects with public information on unit counts and parking supply. These projects provide benchmarks for how jurisdictions and developers have approached reduced parking in transit-accessible locations.

Table 7: Comparable Affordable Housing Projects Summary

Project	Location	Units	Parking Supply (spaces)	Parking Ratio (spaces per unit)	Project Status
995 East Santa Clara	San Jose	125	8	**0.06**	Under Construction
85 S 5th Street[1]	San Jose	111	11	**0.10**	Completed
80 Saratoga Avenue	Santa Clara	200	65	**0.33**	Under Construction
200 E Washington Avenue[1]	Sunnyvale	100	34	**0.34**	Completed
1100 La Avenida	Mountain View	100	44	**0.44**	Completed
1265 Montecito Avenue	Mountain View	85	45	**0.53**	Pursuing Entitlement
1371 Kooser	San Jose	191	130	**0.68**	Approved
3705 El Camino Real	Palo Alto	59	41	**0.69**	Completed
1178 Sonora Court	Sunnyvale	176	134	**0.75**	Completed
3550 El Camino Real	Santa Clara	120	93	**0.78**	Approved
544 W Alma	San Jose	91	94	**1.03**	Approved
	Average	**123**	**63**	**0.52**	-

Notes:
1. Affordable senior living facility subject to different parking demand rates and parking minimum requirements.
Source: Affordable housing project locations and development details were compiled from Catalyze Silicon Valley, an online database of housing developments in the San José and Silicon Valley region (Catalyze Silicon Valley, n.d.). - Additional organizational information regarding affordable housing initiatives serving people with developmental disabilities was obtained from Housing Choices for People with Developmental Disabilities (Housing Choices, n.d.). - Supplementary project summaries and housing development information were referenced from SF YIMBY (SF YIMBY, n.d.).

Local precedent shows that lower parking ratios can function successfully in transit-oriented affordable housing developments. Almost half of the local precedents have a lower parking ratio than the Project. 1178 Sonora Court, a previously approved MidPen development located directly across from Lawrence Station, provides approximately 0.75 spaces per unit, reflecting a more conservative approach for multifamily housing in this station area.

Given this local context, the proposed 0.50 parking ratio remains consistent with transit-oriented development policies and comparable affordable housing projects in the region, particularly given the site's proximity to transit and the availability of parking management strategies.

Qualitative Evidence

Recent research supports the conclusion that TOD can operate with less parking than traditional multifamily standards, particularly when minimum parking requirements are reduced or eliminated. In an empirical study of multifamily housing in transit-served neighborhoods, Gabbe and Pierce (2020) found that developers frequently provided less than one parking space per unit, with an average of approximately 0.68 spaces per unit and a substantial share of developments providing no parking at all[3]. These findings reflect the market response to transit accessibility and confirm that parking demand is often lower in transit-oriented contexts. This is particularly relevant for affordable housing near major transit facilities, where reduced auto dependence and multimodal access further support lower parking needs.

The broader TOD travel behavior literature reinforces these conclusions by demonstrating that residents in transit-oriented environments tend to own fewer vehicles and rely more on transit and active transportation. Bian, Qiao, and Yeh (2023) found that TOD characteristics are significantly associated with reduced private vehicle ownership, which directly lowers residential parking demand[4]. Evidence specific to Silicon Valley further supports these conclusions. A Mineta Transportation Institute review of TOD projects in the region found that residential developments near transit commonly provide parking ratios materially below conventional zoning standards, reflecting both lower demand and evolving planning practice[5]. Together, these peer-reviewed and regional findings demonstrate that reduced parking ratios in transit-oriented affordable housing are consistent with observed development patterns, travel behavior, and parking utilization outcomes.

Key Takeaways

State law establishes that the City cannot impose a higher minimum parking requirement for this project due to its location within one-half mile of Lawrence Station and its deed-restricted affordable housing status, making the proposed 0.50 parking ratio legally sufficient. This approach is consistent with the Lawrence Station Area Plan, which promotes transit-oriented development and reduced vehicle reliance. From an operational perspective, the feasibility of 0.50 spaces per unit depends on resident vehicle ownership and visitor demand remaining aligned with transit-oriented expectations. The project's immediate proximity to frequent Caltrain service, its income targeting including a substantial share of very low-income households, and comparable affordable housing developments in Sunnyvale and elsewhere in Silicon Valley that operate successfully at similar or lower parking ratios collectively support the conclusion that the proposed parking supply is both policy-aligned and operationally reasonable..

[3] Gabbe, C. J., & Pierce, G. (2020). The effects of residential minimum parking requirements in transit-oriented neighborhoods. *Land Use Policy, 91*, 103417. https://doi.org/10.1016/j.landusepol.2019.103417

[4] Bian, Y., Qiao, S., & Yeh, A. G. O. (2023). Mobility resilience: Transit-oriented development, ride-hailing, and car ownership. *Transportation Research Part D: Transport and Environment, 115*, 103585. https://doi.org/10.1016/j.trd.2022.103585

[5] Shoor, I., Pande, S., & Nixon, H. (2021). *Parking supply and demand for transit-oriented developments in Santa Clara County*. Mineta Transportation Institute, San José State University. https://transweb.sjsu.edu/research/parking-supply-and-demand-TOD