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January 27, 2026

Nathan Lindquist, Senior Planner
City of Santa Fe Land Use Department
Current Planning Division
200 Lincoln Ave., 1st Floor
Santa Fe, NM 87501

Submitted Via Email to: planning@sfnm.gov

RE: Cover Letter to Parking Demand Study Requesting an Administrative Deviation for the Nueva Acequia Apartments Development Plan

Nathan:

As of the December 4, 2025 initial submission date of the Nueva Acequia Apartments Development Plan, the existing Land Development Code required a minimum number of 218 off-street spaces per Table 14-8.6-1. However, the Governing Body has recently adopted revisions to the Land Development Code to allow for more flexibility in determining off-street parking requirements. Specifically, these revisions allow for a 25% reduction in parking requirements for Senior and Affordable Housing projects. Under these revisions, this project (100% affordable) qualifies for the reduction.

Given that these revisions will be published and in effect in January 2026 (before of approval of this Development Plan) the Applicant requests that the newly adopted code be applied to the parking requirements for this project.

ADMINISTRATIVE DEVIATION APPROVAL PROCESS

The City of Santa Fe Planning Department has outlined a formal process to review and approve this request. The process is for the Planning and Land Use Director to consider allowing an "Administrative Deviation" based on the Applicant meeting item numbers 1-3 in section 14-2.11(C)(3) of the old code, provided here. This cover letter for the Parking Demand Study is the city's suggested mechanism to provide the Applicant's Administrative Deviation request.

(3) Administrative Deviations

A. *The land use director may approve minor dimensional deviations of twelve inches or less and minor quantitative deviations from the standards in Chapter 14, including standards for the number of required off-street parking spaces, when it is impossible or*

impractical to fully comply with the standards. Approval of administrative deviation is subject to the following:

1. *written request by the applicant explaining the need for the deviation;*
2. *written finding by the land use director that the deviation will not result in any negative health or safety impacts on the community or negatively impact a neighboring property ; and*
3. *an administrative deviation may not allow increased density or allow uses not otherwise permitted in the district.*

ADMINISTRATIVE DEVIATION REQUEST

Please see our answers to item numbers 1-3 below offered for the Land use Director's review, with the goal to approve this "minor quantitative deviation" using the newly adopted code's parking requirements as a guide.

1. **Written explanation of the need for the deviation:**

   This much-needed 100% affordable housing apartment project will provide 159 homes for Santa Fe families, seniors, and individuals. Designing the project to meet the overlapping requirements of financing, zoning height limits, new roadways, resident quality of life, etc. determined the amount of surface area available for parking. The most efficient and largest parking lot design resulted in 165 parking spaces.

   The site cannot accommodate additional parking spaces, and an Administrative Deviation is needed to allow the project to move forward.

   Providing 165 parking spaces was found to be acceptable as explained in detail in the attached Parking Demand Study. This study assessed the actual parking usage of several Santa Fe affordable housing projects. Based on these real-world precedents, a 25% reduction to the "old code" parking requirements is consistent with the actual parking demand at comparable projects and adequately supports the needs of residents and visitors. The 165 parking spaces we are providing also include the parking spaces required for a possible future on-site Daycare (Phase 2) at 100% of the code's parking requirement (no reduction applied).

   Additionally, a 25% reduction is supported by the consensus of the City of Santa Fe Land Use Department / administration which included the same percentage reduction to its parking requirements for affordable housing and senior housing developments in the newly adopted code.

2. **Written ~~finding~~** [explanation to be reviewed] **by the land use director** [demonstrating] **that the deviation will not result in any negative health or safety impacts on the community or negatively impact a neighboring property:**

   Reducing the parking spaces for the Nueva Acequia Apartments by 25% will not result in negative health or safety impacts on the community. This is verified by the Parking Demand Study which demonstrates that 75% of the existing code-required parking meets the needs of other affordable housing projects throughout the city of Santa Fe, without causing spill-over of vehicles onto neighboring streets or properties. For the same reason, there will be no negative impacts to neighboring properties as a result of reducing the parking.

   It should be noted that the submitted Development Plan will also add 38 new on-street parallel parking spaces along the three streets surrounding the site to serve as overflow parking for this project as well as neighboring properties.

3. **The requested Administrative Deviation may not allow increased density or allow uses not otherwise permitted:**

   The Applicant confirms that the requested administrative deviation does not allow for increased density or uses not permitted on the site. This can be confirmed by reviewing the project data provided in the Development Plan.

Thank you for your consideration in this matter and do not hesitate to reach out to me with any questions regarding this request for an Administrative Deviation.

Sincerely,

Alexander Dzurec
Autotroph, Inc.
Agent for the Applicant

MEMORANDUM

To: Dominic Kej

Development Director, TWG Development

From: Bennett Hall, AICP

Howard Cake, PE

Kimley-Horn and Associates, Inc.

Subject: Nueva Acequia Apartments Parking Needs Analysis

Date: December 2, 2025

Dear Mr. Kej:

Kimley-Horn is pleased to present this parking needs analysis for the proposed Nueva Acequia affordable housing community at 1335 Camino de Jacobo in Santa Fe, New Mexico ("Site"). This analysis evaluates whether the planned on-site parking supply, 165 shared spaces across two residential buildings and a potential daycare facility, will adequately meet the anticipated demand for residents, visitors, and staff.

The study draws on industry-standard parking generation data for similar land uses, comparable projects in Santa Fe, and the site's proximity to transit, employment, and services to support a **25% parking reduction** to the amount of parking required by the City of Santa Fe ("City") municipal code ("Code"). This analysis concludes that the proposed parking ratio of **1.04 stalls per residential unit** is sufficient to meet the needs of the Site at peak hours.

PROJECT OVERVIEW

The Nueva Acequia Site is located in the Agua Fria area southwest of downtown Santa Fe, near the Santa Fe County Housing Authority offices and within walking distance of a major transportation and commercial corridor at Airport Road and Cerrillos Road. The Site is currently a vacant parcel neighbored by vacant parcels to the east and southeast, with residential and commercial uses to the north, south, and west. The development would require extensions of local roads San Ignacio Road and Camino San Alberto. The new proposed 10-ft sidewalk along the east side of Camino Sal Alberto would serve as a connected portion of a planned Santa Fe County/City bike trail as part of a greater county-wide multimodal network plan.

Table 1: Development Program Details

Site Program	Program Users	Unit Mix	# units	Parking Supply	Proposed Parking Ratio
Building 1	Low-Income Family	0-4 br	74	113	
	Low-Income Special Needs		32		
Building 2	Low-Income Senior	0-2 br	53	52	
Residential Total			**159**	**165**	**1.04**
Daycare	70 children and 8 employees	-		Included	-

As shown in Table 1, the project includes 159 affordable housing units across two residential buildings. Building 1 will serve low-income families (70% of units) and low-income special needs residents (30% of units) with a mix of studio, one-, two-, three- and four-bedroom units. Building 2 will provide housing for

low-income seniors. A potential third building may house a daycare facility for approximately 70 children in Phase 2 of the redevelopment program to serve residents and the surrounding neighborhood.

The proposed Project's management team will actively manage parking during operations. Management will not allow use of parking spaces for long-term storage, and cars parked must be functional and used regularly. To encourage shared use with the residential visitors and daycare activities during the day, some spaces will be open during the day when tenants are at work Monday through Friday. Signage will be used to instruct daytime users about where to park.

The developer is proposing 165 shared parking stalls to support the shared needs of the entire Site. Conceptual site plans showing this layout are included in Attachments.

CODE-MINIMUM PARKING

Low-income housing (especially low-income senior housing) is typically understood to have a lower parking demand than market-rate multifamily housing. However, the City of Santa Fe does not currently have defined minimum parking ratios specific to low-income housing ("LIH"), although the City is considering allowing a reduced requirement under a forthcoming zoning code amendment with the following provisions:

- A parking demand study is required for parking reduction requests >20%
- The parking demand study should be prepared/reviewed by a traffic engineer and must demonstrate through a variety of established sources (Institute of Transportation Engineers, Urban Land Institute, etc.) that the combination of land uses will generate parking demand that is less than that required in Table 14-8.6-1: Parking and Loading Requirements

At the time of this analysis, the code-required parking minimums applicable to this Site is calculated per Code Table 14-8.6-1 as follows:

Table 2: Code-Required Parking

Use	Minimum Spaces Required						Site Program		Code Requirement
Attached dwelling unit, <800 SF	1.25			per	1	unit	123	units	154
Attached dwelling unit, 800-1,200 SF	1.50			per	1	unit	34	units	51
Attached dwelling unit, >1,200 SF	2.00			per	1	unit	2	units	4
Daycare	2.00	+	1	additional space per	10	children	70	children	9
								Total[1]	**218**
								Sufficiency / (Need)	(53)
								% Reduction Requested[2]	25%

[1] Totals throughout rounded up to the nearest whole parking space per Code guidance.
[2] Rounded up from 24.3% to 25%.

The Code requires 218 parking spaces, a parking ratio of **1.37 parking spaces per residential unit**. This ratio is blended to include needs for daycare because 1.) the parking supply will be shared and 2.) time-of-day factors (explained more in the ITE Parking Generation section) indicate that the site will experience less demand during the day when the daycare is active and an estimated 40-50% of resident vehicles have left the site and the highest demand overnight when most residents are home with their vehicles. The Site developer is seeking a 25% reduction to Code-required 218 parking spaces in order to provide 165 parking spaces serving all uses on the Site.

TRANSPORTATION DEMAND MANAGEMENT AMENITIES

The Site is positioned to support households with limited or no vehicle ownership through a combination of transit access, shared mobility options, walkable destinations, and planned multimodal infrastructure. These amenities help reduce reliance on personal vehicles, which validates the lower observed parking demand rates discussed in the ITE Parking Generation and Local Comparable Sites sections that follow in this report.

- **Public Transit Access**
  - Santa Fe Bus System: The Site is approximately 0.5 miles from stops on Routes 2 and 24
    - Route 2 operates with 30-minute headways and connects to key destinations including downtown Santa Fe, Rail Runner Stations, and other Transit Centers.
    - Route 24 provides access to additional neighborhoods and services with 70-minute headways.
    - Transfers can be made from these routes to numerous other fixed bus routes and the Rail Runner commuter rail.
  - Santa Fe Ride: ADA paratransit service for people with disabilities and shared rides for seniors.
- **Shared Mobility**
  - EV Car-Sharing at neighboring Santa Fe County Housing Authority: Electric vehicles are available for reservation via a mobile app. This service offers flexible access to a car without the need for ownership
- **Multimodal Infrastructure**
  - Planned Multimodal Trail: A segment of the Santa Fe County/City bike and pedestrian trail network is planned along the western edge of the Site. This trail will connect to a broader county-wide system.
- **Walkable Services and Employment**
  - Commercial center at Airport Road and Cerrillos Road: Located less than ¼ mile from the Site, includes grocery stores, restaurants, banks, and other essential services.

These multimodal transportation options, combined with the site's proximity to essential services, help reduce reliance on personal vehicles and mitigate the transportation challenges often faced by low-income households. The following ITE Parking Generation and Comparable Site analyses demonstrate how parking demand generated by this site, given the market it is serving and the proximate alternative transportation options, is projected to be lower than market-rate multifamily developments.

ITE PARKING GENERATION

The Institute of Transportation Engineers (ITE) Parking Generation Manual (6th Edition) provides industry-standard data estimating parking demand based on land use. ITE collects parking utilization data from member organizations that have performed parking occupancy studies at specific land use types and provides parking demand ratios based on the observed conditions at the sites.

For this study, Kimley-Horn used 85th percentile ratios from ITE's dataset to provide a conservative estimate of parking demand based on the relevant land uses: Daycare and affordable multifamily housing (including family, senior, and special needs affordable housing) in urban and suburban contexts. The 85th percentile represents the highest performing (i.e., busiest) comparison sites.

We then input these demand ratios into a shared parking model developed by the Urban Land Institute (ULI). This model allowed us to evaluate how a mix of uses would generate parking demand throughout the day in the shared parking lot, simulating real-world conditions to identify when demand is likely to peak. The resulting weekday and weekend hourly demand estimates are illustrated in Figure 1 and Figure 2 on the next page.

Figure 1: Projected *Weekday* Hourly Parking Demand

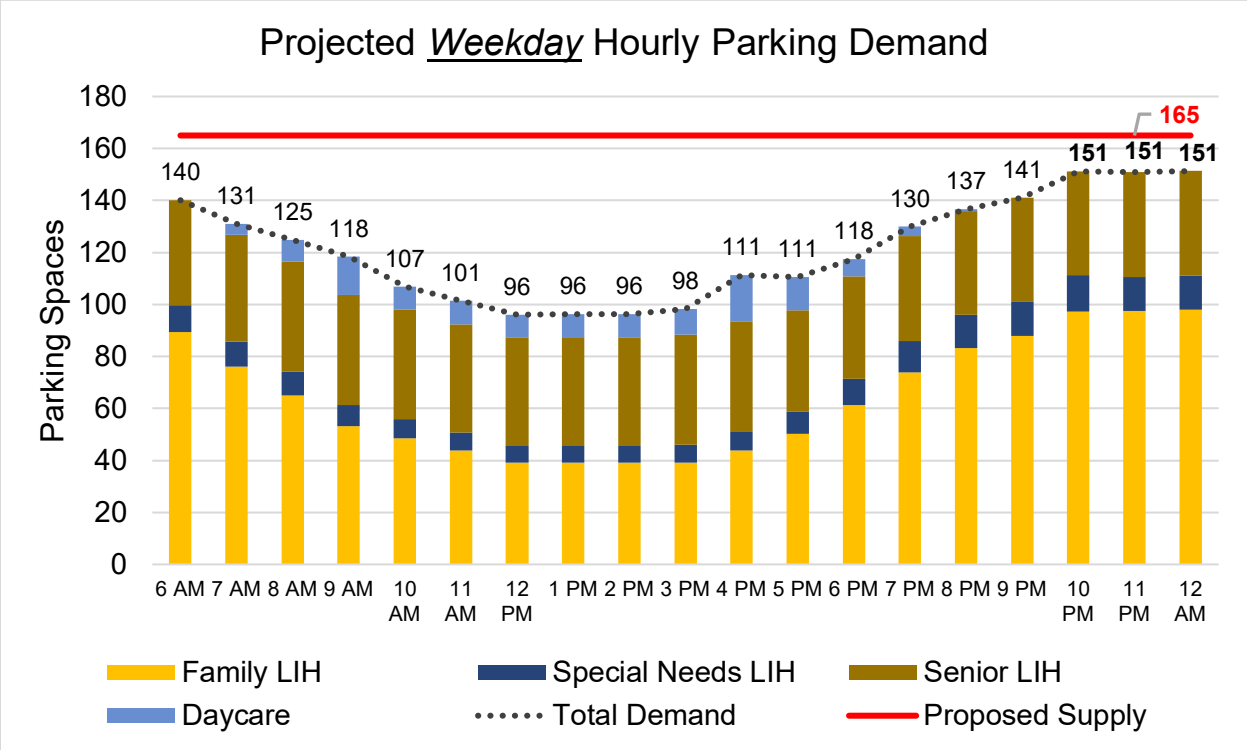
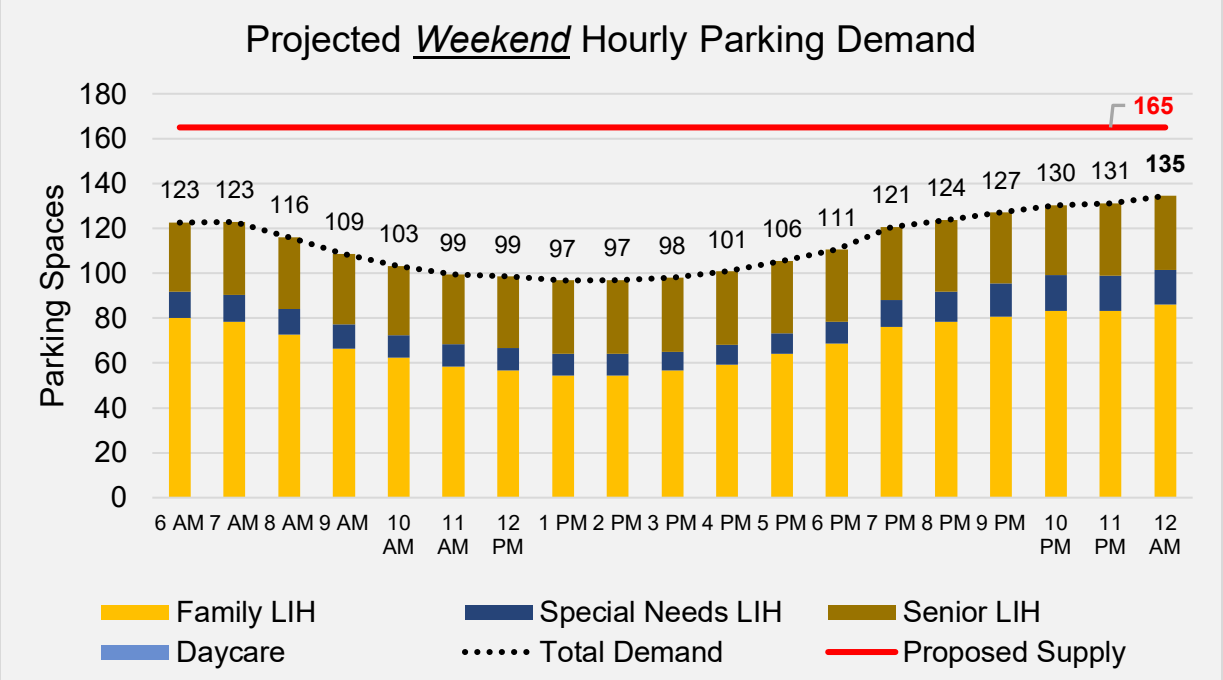


Figure 2: Projected *Weekend* Hourly Parking Demand



With 159 residential units proposed, this shared parking model projects a weekday peak demand of 151 spaces, which equates to a **parking ratio of 0.95 spaces per residential unit**. These model results indicate the 165 on-site spaces can sufficiently serve peak demand expected to occur overnight. Note:

We recommend that the site property manager not assign reserved parking spaces to tenants so that the daycare and visitors can use the most proximate parking spaces for their needs. This management approach will ensure the site can meet its shared parking potential as projected in the model above.

A detailed breakdown of the shared parking model inputs and outputs is provided in Attachments.

LOCAL COMPARABLE SITES

To refine the expected real-world parking demand for the Site, Kimley-Horn conducted a comparative analysis of four established low-income housing developments in Santa Fe. The four sites were selected due to their comparability with this site in transit accessibility, surrounding land use, and populations served. Each comparable site was evaluated for actual parking utilization during peak demand (overnight) between 1:30AM and 3AM on October 15th, 2025.

Table 3: Comparable Site Analysis Findings

Comparable Site	Resident Type	Occupied Units	Observed Parking Occupancy	Peak Demand Ratio[1]	Comparable Nueva Acequia Unit Types	Projected Nueva Acequia Demand[2]
Las Palomas	Family LIH	269	318	1.18	74	88
La Luz	Special Needs LIH	32	6	0.19	32	6
Villa Consuelo and Pasa Tiempo Combined	Senior LIH	216	135	0.62	53	33
				TOTAL	**159**	**126**

[1] Equals observed parking occupancy divided by number of occupied units
[2] Peak parking demand expected at Nueva Acequia for similar units (family LIH, special needs LIH, senior LIH) based on the observed parking demand ratio at each comparable site.

By collecting current residential unit vacancy rates from each comparable site, we accounted for any impact that vacancy might have on parking demand, using only occupied residential units to develop the comparable site demand ratios.

Together, the four sites represent the three types of populations served by the proposed Nueva Acequia Site. We calculated a peak demand ratio for each of the three types of sites and applied them to the number of units dedicated to each resident type at Nueva Acequia. Through this comparable use analysis, we project that the Nueva Acequia residences will generate a **peak demand of 126 parking spaces**.

SUMMARY

This parking needs analysis utilized nationally published parking ratios from ITE, data from comparable projects, and multimodal transportation information to demonstrate how parking demand at the proposed Site is right-sized and would adequately serve the residential and daycare uses with a parking supply that is 25% less the base Code requirement.

Table 4: Parking Needs Analysis Summary

Parking Calculation Metric	Needed Parking Spaces	Parking Ratio[1]	Sufficiency / (Need)[2]
Proposed Supply	165	1.04	
Base Code Requirement	218	1.37	**(53)**
ITE Parking Generation	151	0.95	**14**
Comparable Sites Analysis			
Family LIH	88	1.18	**39**
Special Needs LIH	6	0.19	
Senior LIH	33	0.62	

[1] Equals the number of parking spaces divided by number of residential units. Excludes daycare due to shared parking time-of-day factors modeled in Figures 1 and 2.
[2] As compared to the proposed supply of 165 spaces.

The ITE Parking Generation analysis and Comparable Use Study project that a parking supply of 165 spaces will result in **parking sufficiency of 14 to 39 spaces at peak hours of demand**, which will allow the site to function optimally for the mix of residential and daycare uses throughout the day without overflow parking disrupting the surrounding neighborhood.

Please contact Bennett Hall with any questions regarding this analysis.

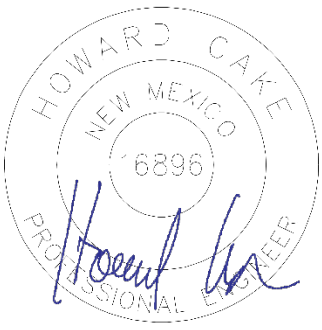
Regards,

Bennett Hall, AICP
Parking & Mobility Planner / Project Manager

Howard Cake, PE
Project Engineer

ATTACHMENTS

- Attachment A: Nueva Acequia Site Plan, 09/29/2025, by Autotroph Design
- Attachment B: ULI Shared Parking Model Summary Table



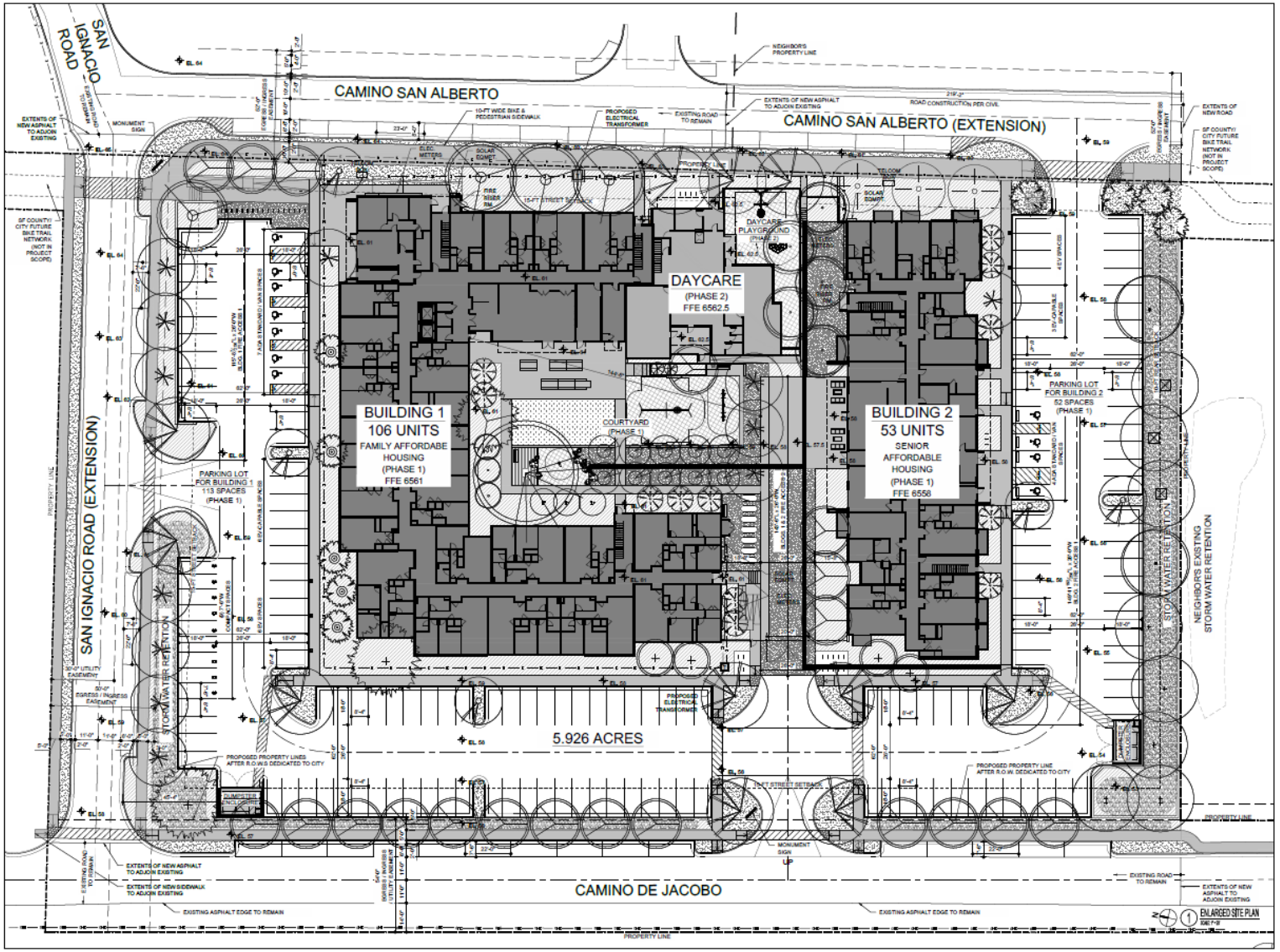


Figure 3: Nueva Acequia Site Plan, 09/29/2025, by Autotroph Design

Shared Parking Demand Summary																		
Peak Month: JANUARY -- Peak Period: 11 PM, WEEKDAY																		
Land Use	Project Data		Weekday					Weekend					Weekday			Weekend		
	Quantity	Unit	Base Ratio	Driving Adj	Non-Captive Ratio	Project Ratio	Unit For Ratio	Base Ratio	Driving Adj	Non-Captive Ratio	Project Ratio	Unit For Ratio	Peak Hr Adj 11 PM	Peak Mo Adj January	Estimated Parking Demand	Peak Hr Adj 12 AM	Peak Mo Adj January	Estimated Parking Demand
Hotel and Residential																		
Family LIH																0%		
Residents	74	units	1.26	100%	100%	1.26	unit	1.07	100%	100%	1.07	unit	97%	100%	91	100%	100%	80
Visitors	74	units	0.10	100%	100%	0.10	unit	0.15	100%	100%	0.15	unit	80%	100%	6	50%	100%	6
Special Needs LIH																0%		
Residents	32	units	0.34	100%	100%	0.34	unit	0.39	100%	100%	0.39	unit	97%	100%	11	100%	100%	13
Visitors	32	units	0.10	100%	100%	0.10	unit	0.15	100%	100%	0.15	unit	80%	100%	3	50%	100%	3
Senior LIH	53	units	0.52	100%	100%	0.52	unit	0.35	100%	100%	0.35	unit	98%	100%	27	98%	100%	19
Residents			0.28	100%	96%	0.27		0.25	100%	100%	0.25		98%	100%	13	98%	100%	14
Office																		
Day Care Center	7,000	sf GFA	1.75	100%	80%	1.40	ksf GFA	0.00	100%	80%	0.00	ksf GFA	0%	100%	-	0%	100%	-
Employee			2.00	55%	100%	1.10		0.00	55%	100%	0.00		0%	100%	-	0%	100%	-
Additional Land Uses																		
													Customer/Visitor		36	Customer/Visitor		28
													Employee/Resident		115	Employee/Resident		107
													Reserved		-	Reserved		-
													Total		151	Total		135

Figure 4: ULI Shared Parking Demand Summary

Note: 7,000 SF GFA is an estimate for a daycare serving up to 70 children with eight staff members, based on:

- *50 SF of children's activity areas per child (3,500 SF)*
- *1,000 SF of staff workspaces and offices*
- *2,500 SF of support spaces i.e. kitchen, restrooms, storage.*