

Dear Planning Commission and Staff,

Since parking policies represent a big issue in the Community Design Element and pertain to the Circulation and Land Use Elements as well, we are providing a separate testimony on parking policy. Parking plays a huge role in whether we can achieve many of the goals in the GPU including balanced transportation with good access, affordable housing, economic development and quality of life.

Minimum parking requirements cited in the Community Design Element as “best engineering practices” (CD-P9) are based on peak parking demand in automobile dependent suburbs where parking is free. The per-square footage correlation with parking demand is extremely weak, but parking requirements are often based on square footage anyway. These minimum parking requirements increase construction costs, decrease land values, increase housing costs, increase costs of goods and services, drive architectural and site design (often resulting in undesirable outdoor spaces, i.e. parking lots), force low density development that is difficult to access by walking, biking or transit, prevent building reuse, impact water quality because of runoff issues, and result in other adverse impacts.<sup>1</sup>

- Construction costs: every surface parking space costs about \$2500 to construct, not including land values for that space which are often much greater.<sup>2</sup>
- Land values: because parking often occupies more land than the built development itself, it limits what can be done with the property thus reducing the value often by as much as 30%.
- Housing costs: Homeowners and renters pay for construction or access to parking whether they use it or not. A single family home requiring four parking spaces could easily accrue \$40k in parking construction and land costs.
- Costs of goods and services: when you go into a store with ample parking, you pay for it at the cash register in increased costs for goods and services to cover the cost of parking construction and land.
- Design limitations: because parking requirements use much of the land in site planning, it is the first thing laid out and often essentially determines the footprint of the building.
- Non-auto modes: When more land is used for parking than development, crossing the large expanses of parking on foot or by bicycle becomes much more difficult. It also becomes difficult to place transit stops close to housing and services. Consider all your favorite walk-able downtowns: Eureka’s Old Town, Ferndale, the Arcata Plaza. None of these places could have been built with today’s minimum parking requirements, and in fact, all of them were mostly built without any parking requirements.
- Building reuse: if code requires a business owner to meet parking requirements when there is a change in building use, it often makes reusing older buildings impossible.
- Water quality: more parking means more pavement which means more polluted runoff.

We suggest a few different strategies to shift toward a paradigm that gets us the right amount of parking at the right price.

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<sup>1</sup> Donald Shoup. 2005. The High Cost of Free Parking. American Planning Association, Chicago, IL.

<sup>2</sup> Steven Sullivan, HSU Parking Manager, personal communication, 2007.

The first suggestion will seem radical, but it is not. Would you require all restaurants to include dessert with every meal they serve? Of course not. No one wants to subsidize other people's desserts if they don't happen to want dessert, and nobody wants the whole county to get diabetes. But minimum parking requirements are like requiring free dessert. While individuals appreciate always being able to park for free, in the big picture, minimum free parking requirements are messing up everything from the environment to our own health.

### **Strategy One:**

*Eliminate Minimum Parking Requirements:* Let the market decide how much parking should be built for a given piece of development. If a developer wants to build a project with less parking and thinks he can find tenants or a buyer, allow it.

*Manage spillover parking:* If and when spillover parking occurs, manage on-street parking with permits for residents. This will keep spillover out of adjacent neighborhoods although residents may wish to create a parking benefit district (see below).

*Charge the right price:* If on-street parking becomes difficult to find, use parking meters (in a commercial district) or permit sales (residential district) and pricing to manage for 85% parking occupancy. This will maximize the use of available parking and rate of trip turnover while making one or two spots available on every block so it is easy to park, reducing congestion caused by vehicles cruising in search of a parking space.

*Parking Benefit Districts:* Allow business improvement districts, neighborhoods and even single blocks in a residential district to utilize funds from parking permits and metered parking locally. Each district may decide differently how to use its funds. Sidewalk cleaning and repair, construction of traffic calming features, under-grounding of utilities, and planting and maintenance of street trees are some of the things a benefit district might choose to do with their parking revenue.

### **Strategy Two**

Some weaker alternative policies would be helpful in unsaddling our development from onerous parking requirements, but not as effective as the strategy described above.

- Reduce minimum parking requirements (perhaps by half)
- Change the existing minimum parking requirements to maximums.
- Allow payment of in-lieu fees for developers wishing to construct less than the minimum parking requirements. These fees might be used to fund bicycle, pedestrian and transit infrastructure to better serve these buildings with reduced parking supply.
- Right-price parking and parking benefit districts could still be used in conjunction with these weaker strategies.

Thank you for carefully considering these strategies to help achieve the general plan goals. It's time to shift from subsidizing parking to subsidizing people and places.

Respectfully submitted,

A black rectangular box containing a white handwritten signature that appears to read "Chris Rall".

Chris Rall  
Green Wheels – Executive Director