

31 March 2008

Humboldt County Planning Commission and Staff:

We are a coalition of environmental groups, businesses, and developers who would like to see parking policies in Humboldt County reconsidered. We hope a final Circulation Element, Community Design element, and other General Plan elements will address our concerns regarding parking policy in Humboldt County.

Parking management policies are intended to provide for convenient access to travelers' destinations, facilitate commerce, improve traffic flow, and prevent unsightly parking patterns in urban and suburban environments. However, the present policy of minimum free parking requirements does not achieve these goals:

1. Minimum free parking requirements typically provide parking in excess of necessity. Most often, more land is dedicated to parking than to the buildings parking lots serve, creating vast open lots which everybody — motorists, pedestrians, and bicyclists — must cross under their own power at some point in their trip. The spread out distances make it less convenient for people to walk, take transit, or bike, discouraging use of these modes and encouraging more driving and parking demand. Since we are all pedestrians at some point in any given trip, the presence of more parked cars requires motorists to walk further to and between any subsequent destinations.
2. The costs of providing free parking — i.e. for the land, construction, and maintenance — are bundled into nearly all our economic transactions. Instead of stimulating our economy, this adds to the costs of doing business and living in our area. Parking requirements can make it difficult or impossible to change the use of buildings and thus hamper redevelopment efforts and prevent us from maximizing use of and return on investment in preexisting structures, business districts, and neighborhoods.
3. High demand for limited free on-street parking can lead to excess (and useless) vehicle miles traveled as motorists “cruise” for available parking. Off-street minimum parking requirements are intended to prevent this problem, but there are other ways of achieving the same goal, namely to “right-price” on-street parking, which means charging for parking at a rate which maximizes its usage while facilitating a higher turnover rate and keeping sufficient parking spaces available for motorists to conveniently park without cruising.
4. Off-street minimum free parking requirements as a response to the unsightliness of on-street parking create their own aesthetic problems. Excessive parking off-street frequently results in downtown environments that are less pleasant and interesting. For example, compare the Central Avenue downtown district in McKinleyville with Eureka's Old Town. The downtown environments people enjoy today could not be built under present minimum free-parking requirements.

Additionally, the present approach of managing parking supply presents several other problems:

1. The present policy runs contrary to free market principles. It squashes natural market incentives for innovation and superior decisions with regard to land use, making it difficult or impossible for developers or businesses to calibrate parking capacity to factors that may reduce demand, such as proximity to transit stops, accessibility by bike and walking routes, surrounding densities, or the existence of transportation demand management (TDM) programs like parking cash-outs or transit passes.

2. Bundled parking is unfair to income-disadvantaged groups. The significant costs of providing parking are bundled into the cost of commercial and residential properties people rent and buy, as well as goods and services. This can be unfair to people and families who travel by alternative transportation modes, don't own a car, or own fewer cars than average.
3. This policy is at odds with many of our community's planning goals — to provide affordable housing for our community and ensure that property tax revenues will support essential county services. Excessive minimum free parking requirements increase development costs, and indirectly, housing costs, while decreasing land values (www.salon.com/news/feature/2007/10/01/parking/).

We propose the following changes to better achieve goals for parking policy:

1. Anti-market minimum free parking requirements should be significantly reduced or eliminated, acknowledging it is in the interests of developers and business owners to provide sufficient parking so as to allow motorists access. A less-regulated environment will generate natural incentives for implementing mobility management programs, such as bus passes, carsharing programs, bike parking and amenities, and parking cash-out opportunities, to operate.
2. Minimum free parking requirements, if they are retained, should be decreased on a per-development basis to take into account any traffic mitigation measures such as new bicycle and pedestrian connectivity, transit pass programs, or other infrastructure alternative modes or transportation demand management strategies.
3. Existing minimum parking requirements should be changed to maximums. Most parking minimum requirements are set to accommodate peak-demand parking, so it is extremely unlikely that any parking supplied beyond these requirements will be used, let alone cost-effective.
4. Allow payment of in-lieu fees for developers who wish 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. Decisions for how to spend the revenue generated by in-lieu fees should be made by a local jurisdictional unit if it exists, such as a Community Services District or a specially-formed Parking Benefit District.

The policies proposed in the draft Community Design Element — CD-P9 “Reduce Parking Requirements,” and CD-P10, “Minimize Excess Off Street Parking Areas” are on the right track. However, we recommend that the element should be revised to be more specific about aggressive parking requirement reductions, or perhaps even their elimination. Since reducing parking requirements may lead to spill-over effects, implementation measures (such as right-pricing on-street parking and parking benefit districts) should be included in the element to make parking policy changes more viable and accepted.

We appreciate the opportunity to offer our input. We invite commissioners and planning staff to contact us with any questions.

Signed,

Green Wheels
Northcoast Environmental Center
Sierra Club North Group