

APPENDIX F.

PARKING POLICY REPORT

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Governor's Commute Trip Reduction Task Force
Subcommittee on Parking, Model Programs, and Training
RCW 70.94.521-551

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Introduction

Subcommittee Charge

The Commute Trip Reduction (CTR) law (RCW 70.94.521-551) mandates that each affected jurisdiction's CTR plan "shall include...a review of local parking policies and ordinances as they relate to employers and major worksites and any revisions necessary to comply with commute trip reduction goals and guidelines." (RCW 70.94.527 [4e])

The Governor's Commute Trip Reduction Task Force Subcommittee on Parking, Model Programs, and Training was given responsibility for addressing this section of the law. The subcommittee framed a number of issues for further discussion. Recommendations emerging from the subcommittee deliberations were then brought forward for adoption by the full task force.

The parking recommendations contained in this paper are intended to give direction to jurisdictions in their review and revision process and to help achieve regional consistency in parking policy changes. Special workshops on parking policy issues for local jurisdiction staff are also being explored for later this year. Following the recommendations for local governments, there are some additional recommendations outlined for action by the task force itself.

The subcommittee recommendations cover parking supply, parking cost, and site design. They also address modification of parking supply at existing sites. Because of the focus of the CTR law, the subcommittee considered applications to long-term (all-day) employee parking, rather than short-term customer parking, such as at retail sites.

The recommendations are designed to encourage local land use codes to respond to reductions in parking demand as single-occupant vehicle (SOV) use decreases through CTR programs and to encourage local jurisdictions to provide flexibility for employers to use parking management as an element of their CTR programs.

Each jurisdiction may make its own decisions regarding the strategies recommended here, as local parking requirements are the result of many factors, such as land-use policies; and CTR goals are one among a number of considerations. However, local parking policy is critical to the success of the CTR law because of the close relationship between commuter behavior and the supply and cost of

parking. The regional nature of transportation systems calls for a coordinated approach to parking policy revisions, and the schedule and requirements of the Growth Management Act (GMA) provide an appropriate opportunity to make such revisions.

Importance of Local Jurisdiction Parking Policy Review

There is a large body of evidence to indicate that parking demand has changed in the last 15 to 20 years.

“Parking demand for offices is declining because of changes in the workplace. Not only are suburban businesses more likely to consist of a higher ratio of professional to clerical and blue-collar workers, but also proliferating technology has filled the workplace with new equipment, from computers to facsimile machines. As a result, there are fewer employees in the same size space, with a proportional reduction in parking and traffic. Peak parking rates 15 years ago were generally between three and 3.5 spaces per 1,000 square feet of floor space. Most developers and employers today find that their rate is below three.”ⁱ

In addition to the change in employee density, other changes in parking patterns that have occurred over the last decade include smaller average car size, increased development of mixed-use projects, and changes in peak shopping hours due to longer business hours.ⁱⁱ It is anticipated that parking demand will drop still further with the implementation of the CTR law as an increasing number of employees at major worksites shift from SOVs to ridesharing, bicycling, and walking modes.

Local jurisdiction standards for off-street parking have not kept pace with the changes in parking demand. There are several reasons that parking standards may be, on average, excessive or inaccurate.

“First, few communities have the staff time or financial resources to conduct a comprehensive review of local parking standards on a regular basis. Many do not have the resources to even analyze standards for a few uses. Because of these limitations, standards are sometimes transferred from code to code without being adapted to a city’s specific parking needs. Second, even when standards are established on the basis of studies of observed demand, they may be overly rigid and inflexible when it comes to individual uses.”ⁱⁱⁱ

Many local jurisdictions base their standards on information contained in the *Parking Generation* manual published by the Institute of Transportation Engineers (ITE). The problem is that while the ITE manual is the largest, most comprehensive source for observed parking utilization, with a database include some 1,500 individual parking studies that have been conducted since 1978, some of the data are based on as few as *one* parking survey and therefore do not reflect national or regional trends.^{iv}

The bottom line: **Setting parking requirements is a policy decision, not purely a technical one.** A major policy-related issue is how much allowance to provide over the design-level demand in setting the size of a given parking facility. Some cities are adding a maximum parking requirement in addition to the traditional minimum in order to cope with congestion, reduce pollution, and encourage the use of non-SOV modes. There is also a growing trend toward reducing the number of required spaces.

Finding the balance between excessive and adequate standards is often very difficult and needs to be based on trends specific to each jurisdiction. The subcommittee's task is to structure guidelines for use by local jurisdictions in reviewing their standards, rather than to prescribe actual parking ratios. A comparison of existing standards for key local jurisdictions in Washington is also offered.

Background

Local Experience

Although there is a wide array of land uses that have major worksites with 100 or more employees arriving between 6:00 and 9:00 a.m., only three types of land uses were examined by the Parking Subcommittee. These were office, manufacturing, and institutions (i.e., hospitals).

Tables 1 and 2 indicate the range of parking requirements for Washington cities and counties for office and manufacturing uses.

For **business and professional office uses**, minimum parking requirements vary from 0.67 space per 1,000 gross square feet (gsf) of floor area in the Seattle central business district (CBD) for “areas with high transit access” to 5 spaces per 1,000 gsf in King County, Yakima, and Lynnwood (customer service sites).^v The city codes average 1.66 spaces per 1,000 gsf, and the county codes average 3.0 spaces per 1,000 gsf.

As with office uses, parking requirements for **manufacturing** developments vary over a broad range.^{vi} Seattle requires 0.66 space per 1,000 gsf, while Spokane County requires 2.5 spaces per 1,000 gsf of building floor area. Eight jurisdictions have requirements within the range of 1.0-1.25 spaces per 1,000 gsf. Requirements for cities average 1 space per 1,000 gsf, and requirements for counties average 1.5 spaces per 1,000 gsf. Manufacturing is the only type of zone where codes tend to also consider the actual employment density or number of people actually working in the buildings. Seven jurisdictions have established their requirements based on the number of employees on the maximum shift. The average requirement is 1 space per 2 employees.

Based on evidence from elsewhere in the country and several local studies, a strong case can be made for reducing off-street parking requirements for office and industrial uses in most Washington cities and counties.

Local studies conducted in King County and south Snohomish County indicates that excess supply exists. The Municipality of Metropolitan Seattle (Metro) conducted a *Parking Utilization Study* in 1991 at 36 non-CBD office and industrial worksites with 100 or more employees.^{vii} The study results showed that average supply at the office sites was 3.78 spaces per 1,000 gsf, while average demand was 3.05 spaces per 1,000 gsf. The supply/demand ratios reflect employment at full occupancy for 22 of the 36 sites included in the study.

Table 3 shows a selected sample of sites in different jurisdictions and their minimum parking requirements compared to demand and supply. Of the 17 office sites listed, four had insufficient parking. The remainder had parking surpluses. The industrial sites showed a similar trend, as displayed in Table 4.

These preliminary study results confirm a previous study of parking generation rates conducted by Metro as part of the 1989 *HOV/TSM Study*.^{viii} For the ten suburban office sites included in that project, total spaces supplied per 1,000 gsf was 3.33, and total spaces occupied per 1,000 gsf was 2.78.

Survey of Local Jurisdiction Planning Staff

In November 1991, a survey regarding parking standards and trends during the past two years was sent to 29 local planning officials in Washington. The 19 responses received indicate some interesting trends.

Requests by developers to go below the minimum parking requirements do not occur frequently. One of the main reasons developers do not ask more often to go below the minimum is that such requests currently require a variance, which is normally a lengthy, involved process. In most local jurisdictions, a variance must go before the hearing examiner or board of adjustment. Typically, it takes as long as four months to obtain a variance. This is why developers find it easier to comply with the minimum standard than to request a reduction in parking below the minimum.

Nevertheless, in the past two years between 4 and 20 percent of the permits issued in half of the 12 cities responding included such requests. Four out of seven responding counties also experienced such requests, ranging from 2 to 25 percent of the permits issued. Ten out of 17 responding jurisdictions have allowed parking to go below the minimum by variance or other exemption.

National Experience

The biggest issue for suburban jurisdictions is office parking.^{ix} The floor area of an office building and the number of employees can be used as indicators of the amount of parking required for an office building. However, the number of employees to occupy a proposed building is often not known. If an office development is considered speculative – built in anticipation of a market for office space – the developer will clearly not know the number of future employees. Complicating this is the fact that there is a wide variation in employee density by type of office use.

Although office parking needs varies widely according to location and type of office use, parking requirements have generally been decreasing slightly as space per employee has increased. Florida, Texas, and California are states that are on the regulatory forefront for office standards.^x This has resulted from the fact that these states are being forced to deal with auto-related congestion and air pollution.

Nationally, the following studies have shown that supply is greater than needed:

1. A 1988 study by Robert Cervero showed that the average suburban employment center includes 3.85 parking spaces per 1,000 gsf of floor space, while suburban workers require around 2.22 spaces per 1,000 gsf.^{xi}

2. A 1986 Urban Land Institute study of suburban business parks showed that even at the peak hour of demand, the park with the highest utilization rate still had almost 40 percent of its parking spaces vacant. The data suggested that a parking ratio of 2.0 would be sufficient to accommodate overall needs of most business parks.^{xii}
3. A 1988 article by Robert T. Dunphy in Urban Land states that peak parking rates 15 years ago were generally between 3 and 3.5 spaces per 1,000 gsf of floor space. Most developers and employers today find that the rate is below 3.^{xiii}

In contrast to office development, the growing reliance on outpatient services has driven up the demand for parking at hospitals. A distinction, therefore, needs to be made between visitor and employee parking. The traditional approach has been to tie the number of parking spaces to the number of beds. Now square footage has become a more accurate indicator.^{xiv} A related development is that hospitals, in order to attract new doctors, have encouraged the construction of medical office buildings nearby.^{xv} New offices have added to the total parking demand around hospitals.

Parking Policy Issues

Issue 1: Basis for Setting Local Jurisdiction Parking Standards

The subcommittee proposes the following guidelines for local jurisdiction review of parking policies and ordinances:

- A. Coordinate review of local parking standards with adoption of new comprehensive plans required by the GMA.

Pursuant to the GMA, jurisdictions have until July 1993 to adopt comprehensive plans covering land use, housing, capital facilities, utilities, rural areas, and transportation. The transportation element must be consistent with land use, which includes regionally coordinated level-of-service (LOS) standards for all arterials and transit routes. Comprehensive plans must also include demand management strategies. Review of parking policies should occur before July 1993 and should be consistent with the LOS standards established as part of the new comprehensive plan.¹

¹ The idea behind making parking policy consistent with LOS is that tightening parking supply at worksites along an arterial may help reduce SOV trips and, ultimately, traffic congestion (as measured by LOS).

B. Determine land-use types that will be affected by the CTR law.

Although the jurisdiction may have other reasons for reviewing its parking standards, if the CTR law is the force driving such a review, there are certain land-use types, such as residential and retail, that will not be affected by this mandate. Other than office, industrial, and institutional uses, there are probably additional land-use types, such as business parks, light industry, and high schools that should be a target for examination.

C. Review parking experience elsewhere.

Taking note of where a community falls within the range of jurisdictions for a particular land use will be instructive. If the parking requirement is much higher than that of other jurisdictions, the rationale for having a higher requirement should be closely examined. It is also desirable to have some degree of regional consistency so that developers will not “leapfrog” from jurisdictions with tighter parking standards to those that have no maximum parking standard restricting supply.

D. Survey parking demand and problems at existing developments.

Field studies and surveys are the best sources of information on parking demand. Surveys may be designed to study “problem” land uses or classes of land uses. However, local jurisdictions may not have the resources to undertake field surveys of their own and may have to rely on research conducted by others or experiences of jurisdictions with similar characteristics.

E. Establish a parking policy and zoning requirements.

After determining the typical ranges in parking demand, each jurisdiction should develop a policy on how exact the fit should be between supply and demand. That is, should supply be provided to satisfy current demand, or should the supply be slightly below demand in order to encourage the use of alternatives to SOVs? Even when standards are established on the basis of studies of observed demand, they may be overly rigid and inflexible when it comes to individual uses.^{xvi} City staff should be given leeway in interpreting ordinances and technical requirements.

F. Monitor parking standards.

The adequacy of parking standards should be monitored at regular intervals through field surveys and checks. A first review is

recommended in 1995, with another review in 1997, to assess local jurisdiction progress toward meeting its CTR goals. Problems experienced by local jurisdictions in implementing changes in parking policy should also be reported to the CTR Task Force.

RECOMMENDATIONS:

- Review parking policies and standards in conjunction with and consistent with arterial and transit levels of service required under the GMA. The timing of parking policy review should be coordinated with new comprehensive plan adoption required by GMA by July 1993.
- Review off-street parking requirements for professional office and industrial uses, as well as related land-use categories such as business or industrial parks, high-tech, and light industry. Institutions should be dealt with on a case-by-case basis. Standards should be set to meet actual demand rather than provide “ample” parking.
- Conduct parking demand studies, if desired, to supplement previous national and local studies that analyze the supply of parking at office and industrial sites. Explore the use of Congestion Management Funds available through the Federal Congestion Management and Relief and Surface Transportation Program to support studies relating to parking policy.
- Report to the CTR Task Force, in the annual progress report, any problems experienced in implementing these recommendations, such as inadequate resources.

Issue 2: Adjusting Parking Supply

Parking requirements in local zoning ordinances have been developed over the years to ensure that adequate off-street parking is provided. These requirements reflect local goals of enhancing access, improving traffic circulation, and preventing neighborhood parking problems and other potential traffic-related nuisances. In some jurisdictions, particularly ones facing rapid growth, planners are beginning to view parking policy in a larger context. A number of communities, through options implemented in their zoning codes, allow reductions in the amount of parking required. These reductions can be applied to either individual land uses or special areas of the community. Sometimes, the reductions come in the form of incentives that encourage HOV modes.

Strategies for Reducing Supply

Based on research cited in the sections on local and national experience, a strong case has been made to demonstrate that there is currently a parking surplus, compared with demand. Passage of local TDM ordinances will reduce demand further, creating a larger gap between supply and demand.

There are a number of ways local jurisdictions can reduce parking supply. The primary strategies include:

- reducing minimum parking requirements
- eliminating minimum requirements entirely
- setting maximum parking standards
- allowing shared parking for sites with a balance of mixed uses
- reserving parking for HOVs

One of the primary concerns local jurisdictions have about reducing parking standards is the potential for spillover parking to occur. The point should be made that if parking requirements are tailored to fit demand, concern about spillover may prove unjustified. If spillover does occur, however, there are three primary approaches for addressing it: (1) require the developer to reserve a certain portion of the site as open space in case additional parking is needed in the future, (2) install short-term meters, and (3) establish a residential parking permit program in neighborhoods that abut employment centers where parking supply has been tightened. The latter program involves issuing permits to residents for long-term parking while limiting non-residents to two-hour parking.

Reducing Minimums

There are two ways a jurisdiction can *reduce* minimum parking standards:

1. Reduce the minimum requirement for all the developments within a specific land-use category.

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|-------------|--|
| <u>Pros</u> | <ul style="list-style-type: none">• Treats all developments within a single land-use zone equitably.• Could serve as Phase I of a multi-phased reduction in parking requirements. |
|-------------|--|

- Allows time to study impacts of incremental reductions in the minimum.
- Eliminates added cost incurred in case-by-case review.

Cons

- Could create parking shortages and induce spillover at certain sites.
- Could anger neighborhood residents where potential exists for spillover to occur.
- Could be less consistency among jurisdictions than eliminating minimums.

2. Allow developers to deviate from the minimum by some percentage, based on commitment to TDM actions or ability to prove that less parking is needed at the site for other reasons, such as lower employee density.

Pros

- Guards against spillover parking resulting from parking shortages compared to across-the-board reduction in the minimum standard.
- Could link permitted reductions in minimum requirement to implementation and/or proven results of TDM programs.
- Allows parking supply to be site specific and customized to meet the needs of an individual site.

Cons

- Puts burden on landowners/developers to prove that less parking is needed.
- Potentially treats developers/landowners differently at different locations.
- Potentially increases administrative cost for reviewing individual cases.

A third alternative is a combination of Options 1 and 2. That is, jurisdictions could reduce minimums across the board, yet still allow developers to go below the new minimum on a case-by-case basis. This is the option being recommended by the subcommittee.

Table 5 shows estimated reductions in peak employee parking demand resulting from implementation of the CTR law. This reduction ranges from about five percent in a suburban non-CBD by 1995 to about 19 percent in a high-density non-CBD area by 1999. The subcommittee recommends that minimum parking requirements for office and industrial uses be set at a level commensurate with the projected parking demand for 1995, given achievement of CTR goals.

Eliminating Minimums

A subset of reducing minimums that was considered but not recommended by the subcommittee is *eliminating minimums altogether*. Pros and cons of this strategy appear below.

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|-------------|--|
| <u>Pros</u> | <ul style="list-style-type: none"> • Allows the market to provide and adjust parking supply to accommodate actual parking demand. • Curtails artificially high parking supply where standard is inappropriate for a specific use. • Eliminates the need for a special exception process to allow reductions in parking below a minimum standard. |
| <u>Cons</u> | <ul style="list-style-type: none"> • Opportunity would be removed to link allowed reductions in minimum parking provision of TDM incentives. requirements to • For market to respond to parking oversupply, tenants would need to know the charges they incur for renting parking space. • Jurisdiction would have no control over supply unless requiring developers to prove the sufficiency of parking. • Since most developers are now providing more than the minimum, it is unlikely that eliminating the minimum would cause them to reduce their supply unless tenants start asking for less parking. • In cases where spillover becomes a problem, jurisdictions would bear the burden of proving that additional parking will be required, above what is actually provided. |

Setting a Maximum

Perhaps the most effective way to ensure a reduction in parking supply is to impose a maximum or ceiling on the number of spaces allowed per 1,000 gsf. The cities of Seattle, Bellevue, and Redmond in King County already have maximum requirements for some types of land uses in selected areas; and King, Snohomish, and Spokane Counties are proposing maximums in the draft zoning codes currently before their councils. In the past, maximums have been most common in dense CBD areas where there is a high level of transit service, but they are becoming more common in suburban areas where developers are proposing parking standards above the jurisdiction minimums. The City of Bellevue, for example, has a maximum standard for non-CBD areas in addition to a maximum in the CBD.

Pros and cons of *setting a maximum* include the following:

- | | |
|---|---|
| <p><u>Pros</u></p> <ul style="list-style-type: none">• For speculative developments, prevents overbuilding of parking resulting from prospective tenant needs.• For all developments, ensures that excess parking will not be provided above a certain amount determined to be acceptable by the jurisdiction. | <p>overestimating</p> <p>amount determined to</p> |
| <p><u>Cons</u></p> <ul style="list-style-type: none">• Causes potential hardship for tenants with special needs for parking.• Does nothing to reduce parking supply at the low end of the supply range.• Creates need for another administrative process to grant special exceptions above the maximum standard.• Gives rise to developers' argument that tenant needs are unknown and their perception that parking is needed to ensure marketability.• Creates potential for spillover parking problem. | <p>maximum standard.</p> <p>perception that</p> |

The subcommittee is recommending that local jurisdictions establish a maximum parking requirement for office and industrial uses and that the maximum be set to meet actual demand, including a ten to 15 percent cushion for practical capacity. Practical capacity can be defined as an adjustment to supply to take into account the difficulty and inconvenience of finding the last ten to 15 percent of parking spaces.

Shared Parking

Shared parking refers to parking spaces that can be used to serve two or more individual land uses without conflict. For example, a parking facility can be used by office employees during the day and serve patrons of an adjacent theater at night. Shared parking can also occur when relationships among land-use activities result in people being attracted to two or more land uses on a single auto trip to a given area or development. More local jurisdictions are now encouraging greater mixing of land uses and shared parking facilities. The latest drafts of the King and Snohomish County zoning codes for off-street parking include a section on joint parking.

Reserving Parking for High-Occupancy Vehicles

Requirements to reserve a certain ratio of the total parking area for HOV parking are also becoming more common. This may appear as a requirement for all development in a certain land-use category or as an option for developers who wish to reduce their parking supply below the jurisdiction standard.

The draft Snohomish County code calls for all office and industrial land uses to reserve two parking spaces for rideshare parking for every 25 required parking spaces. The Seattle land use code provides that one vanpool space may be substituted for six parking spaces, while each carpool space in excess of those required may be substituted for two parking spaces (up to a certain limit). The latter provision is an option for developers who want to reduce the amount of long-term parking.

The City of Seattle has an HOV parking program that includes a total of 650 spaces, consisting of both on-street metered and signed and off-street spaces. The program features exclusive access for carpools with three or more occupants between 7:00 and 10:00 a.m. Certified vanpools park for free.

High-occupancy vehicle spaces should be posted as reserved for HOVs arriving between 5:30 and 9:30 a.m. They may be available for other uses after that time.

Table 6 shows projected peak HOV parking demand relative to total demand if SOV reduction goals are met for 1995 through 1999.

Public Parking Authority

In some business districts, local jurisdictions allow for payments of a fee in lieu of required off-street parking. Such payments are typically based on the cost or a percentage of the cost of providing parking in these locations. The intent of collecting such fees is to permit a municipality to finance and build public parking garages. The fund may also be used for providing TDM programs or other programs involving parking management. “In-lieu-of-fee” programs operate in a number of jurisdictions, including Toronto; Lake Forest, Illinois; Mill Valley, California; Montgomery County, Maryland; and Kirkland, Washington.

Adjustment of Parking Supply at Existing Sites

Parking is a facility-related item involved in the design of a new or expanding development. Local jurisdictions normally have control of parking through the building permit process. However, reduction in the minimum parking standard and establishment of a maximum could apply to existing development in two ways:

1. If a property owner of an existing single or multi-tenant site finds that parking demand has dropped, that property owner should be able to request a review by the local jurisdiction. Each jurisdiction has a different administrative process for considering such a change, but presumably it could be handled without the need to go before the planning commission or local elected officials. Theoretically, if the value of land is high enough, the property owner would be interested in converting parking spaces to more financially profitable uses, such as building additional office space or renting out the space to others.
2. The jurisdiction could require existing property owners to come into compliance with the new standards on a phased basis, especially if the site does not meet the CTR law goals within the required time frame.

Spillover parking should not be an issue here, unless the project is a speculative development with constant turnover in tenants. In this case, there could be a higher employee density at some buildings at a future time. To remove land from parking, the property owners would have to demonstrate the ability of the site to accommodate future parking needs.

RECOMMENDATIONS:

- Lower the minimum parking requirement for all office and manufacturing land-use categories to the level of *projected* parking demand commensurate with the achievement of the 1995 CTR goals.
- Allow further reductions below the minimum on a case-by-case basis. Case-by-case deviations below the minimum should be linked to implemented TDM measures. Requests by developers to reduce the parking supply below the minimum should be considered by administrative review rather than a variance process.
- Establish maximum parking standards for new development. Maximums should be set to meet actual demand, including a cushion of ten to 15 percent for practical capacity to guard against spillover. Exceptions to the maximum Standard should be handled by administrative review. In areas where maximums are established, jurisdictions may consider residential permit parking programs or other off-site parking controls, such as short-term meters, if spillover is a concern.

- Base maximum and minimum parking standards for office and industrial uses on studies that take into account employee densities at specific employer sites and full-occupancy projections.
- Reevaluate minimum and maximum standards in 1995 and 1997 to determine whether changes in parking demand resulting from the CTR law warrant additional reductions.
- Require reserved parking spaces for carpools and vanpools at office and industrial sites to accommodate and encourage HOV commuting. These spaces should be nearest and most convenient to building entrances and should be posted as reserved for HOVs arriving between 5:30 and 9:30 a.m. High-occupancy vehicle spaces may be available for other uses after that time. Increase the code requirement for HOV-reserved spaces commensurate with increases in HOV demand resulting from CPTR
- Allow nearby properties with different peak times in parking demand to share parking space as a means of reducing unnecessary supply.
- Establish a public parking management program, funded by contributions in lieu of all or some portion of required on-site parking.
- Establish an administrative process that encourages existing developments to reduce excess parking as an element of their CTR program. These reductions should be consistent with the revised parking standards recommended here for new developments.

A methodology for computing the number of HOV spaces is provided in the Appendix.

Issue 3: Site Design

Bicycle Parking

Bicycling has the potential to be a reasonable alternative to SOV travel, both in high-density areas where there is already a significant amount of bicycle commuting and in low-density areas where there is less traffic and transit service is minimal or unavailable. Provision of bicycle amenities, such as secure bicycle parking facilities, showers, and lockers for storing a change of clothes can help

encourage the use of bicycles for commuting. An increasing number of zoning codes are requiring bicycle parking facilities to be provided, based on a percentage of overall parking spaces. Typically, one bicycle space is required for every ten or 20 motor vehicle spaces. Additional bicycle parking may also be required for specific land uses that generate high bicycle traffic.

Because the design and location of bicycle parking facilities can be critical to encouraging bicycle commuting, zoning code requirements should also include the following points:

1. Bicycle parking facilities should be covered to keep bicycles out of the rain.
2. Facilities should be secure; the cyclist should be able to lock the frame and both wheels without the use of a cable.
3. Bicycle parking should be close to the building entrance.
4. Bicycle parking areas should be out of the way of pedestrian and motor vehicle traffic, but should have good visibility.
5. Bicycle parking facilities should be well lit.

Bicycle parking can take the form of secure, covered racks; bicycle lockers; or a locked room within a building or garage which can be accessed only by cyclists who have keys.

Orientation of Parking Lot to the Building

Employee parking should be designed and located to ensure direct, convenient, and safe access for pedestrians and transit riders between the street and the building entrance.

One means of accomplishing this objective is to locate employee parking to the rear and sides of a building, rather than in front of the building, particularly if the building is adjacent to a transit street. Typically, transit patrons have had to walk through vast expanses of parking to get from transit stops to building entrances. Large parking lots between a building entrance and a bus stop discourage pedestrian access. Developers should be allowed to locate parking for the physically challenged as well as one row of visitor parking in front of the building.

A broad expanse of asphalt in front of a development is no longer a selling point. Both developers and communities are taking steps to limit the amount of parking in front of buildings. Several new zoning codes currently being proposed, including the King and Snohomish County codes, reflect this change in attitude.

Provision of Transit and Pedestrian Facilities

Local jurisdictions should work with transit agencies and developers to establish site requirements for transit facilities, such as pedestrian walkways, shelters, and landing pads if the site is located adjacent to a street with existing or planned transit service. Alternatively, provision of such amenities can be framed as an option in exchange for reduced parking requirements. For example, the City of Vancouver allows developers to reduce parking requirements in exchange for providing covered walkways. The draft Snohomish County code indicates that developments with 200 or more spaces along transit routes may be required to provide transit facilities.

The SNO-TRAN manual entitled *A Guide to Land Use and Public Transportation* (December 1989) is an excellent source of information for local jurisdictions interested in linking parking requirements to provision of pedestrian and transit facilities.

RECOMMENDATIONS:

- Require secure, well-lit bicycle parking facilities close to building entrances. Encourage property owners and local jurisdictions to cooperate so that cost-effective covered bicycle parking, showers, and lockers can be provided. Bicycle parking should be provided as a ratio of total parking stalls, with a minimum specified. A higher ratio may be warranted in dense urban areas.
- Require employee parking to be designed and located to ensure direct, convenient, and safe access for pedestrians and transit riders between the street and the building entrance.
- Work with transit agencies and site developers to establish requirements for transit facilities if the site is located adjacent to a street with existing or planned transit service. Provision of pedestrian facilities, such as covered walkways, should also be encouraged in exchange for reductions in required parking.

Issue 4: Parking Cost

Actual Cost of Parking

Perhaps the greatest deterrent to encouraging the use of HOV modes is the fact that parking is abundant and free for the majority of American commuters. This stems from the fact that most employers, even in dense urban CBDs, subsidize employee parking. At the heart of the problem is the lack of knowledge employers have about their own parking costs. Except in urban downtown areas, where rents are high and parking is often a negotiable item, most building leases do not identify parking as a separate line item. Parking in most suburban and rural areas is not a negotiable item, making it difficult for tenants to reduce their allotted number of parking stalls.

The cost of parking involves more than just construction. Predevelopment costs, development costs, and post-development costs, which are identified as annual costs per space, must be considered. These costs vary by type of space, e.g., surface lot, freestanding multilevel structure, above-grade structure, and below-grade structure. The total development costs in 1987 dollars ranged from about \$5,000 per space for a surface lot to \$40,000 per space for a below-grade multiuse structure.^{xvii} Annual operating costs ranged from \$955 per space for a surface lot to \$4,504 per space for a below-grade structure. The following items must be considered when determining the cost of providing parking:

Design and Construction

- Land cost per square foot
- Design (architect, engineering, drafting)
- Site work
- Initial landscaping
- Paving
- Surfacing (seal coating)
- Curbs
- Drainage
- Catch basins
- Striping
- Parking bumpers
- Lighting
- Signage

Maintenance

- Landscaping (maintenance)
- Landscape plumbing
- Security
- Sweeping (trash removal)
- Watering (including plumbing)
- Waste water disposal

Strategies for Addressing Parking Cost

There are three basic approaches to addressing the issue of parking cost as it relates to the CTR law. The issue here is what is the most effective approach for influencing the practice of employer-subsidized parking. The three approaches include: regulation, incentives, and education. Each of these is discussed below:

1. Regulatory Approach

Option A: Parking Pricing Strategies

Several task force members have asked the subcommittee to endorse parking pricing as a strategy. Their argument turns on three points:

- Parking pricing is more effective than simply managing supply as a strategy for encouraging HOV use because it can affect all worksites, both new and existing.
- Pricing is more flexible than supply; it can be easily changed, whereas supply is fixed and unresponsive to the demand of changing tenants and fluctuating site commitments to TDM programs.
- Parking pricing in suburban areas outside of CBDs could provide a more equitable leasing climate for CBD areas.

The task force could ask the state legislature to amend or revise the 1990 Local Option Commercial Parking Tax to instead focus on a tax aimed at commuters. The local option tax is currently limited to commercial parking businesses (which are rare outside of Seattle) and facilities which charge for parking. Because the Local Option Commercial Parking Tax is unable to target free parking, it dilutes the effectiveness of the tax as a TDM tool and further accentuates the inequalities between free and user-paid parking.^{xviii} The statute currently targets employers who try to encourage alternative commute modes through user-paid parking, but it does not tax those employers who provide free parking. The CTR law could help address some of the shortcomings of the parking tax, primarily its inability to reach all major worksites. If amended, the parking tax could work with the CTR law to enforce its goals. Local jurisdictions implementing the parking tax could use their taxing authority to reinforce the trip reduction goals of their CTR ordinance with price incentives.

Option B: Requiring Separation of Parking in Building Leases

Research has shown that employers are largely unaware of the amount they pay for parking, since parking does not appear as a separate line item in most building leases. The most direct way to increase employer awareness would be to urge local jurisdictions to require developers to separate out the cost of parking in building leases and submit this information to or file the actual leases with the jurisdiction.

Some problems with this idea are:

- It is not clear that local jurisdictions have the authority to require the disclosure of such information.
- It is not clear how jurisdictions could enforce such a law, especially when there is constant turnover of tenants.
- The administrative cost of such a proposal could be significant.
- This proposal would be opposed by developers, who consider such information privileged.

Option C: “Cash-Out” of Parking

Another parking pricing idea that has been initiated in California is the “cash-out” approach. This refers to requiring any employer who subsidizes an employee’s parking space to give that employee the option of taking the market value of that parking space instead of the free or subsidized parking. The only drawback to this idea is that parking is currently a tax-free benefit under IRS regulations, while employees would be taxed if they accepted the market value of parking. Also, attaching a market value to parking that is free could be problematic.

2. **Incentive Approach**

The incentive approach refers to offering incentives to developers or employers in exchange for their commitment to charge for parking. One incentive for developers would be to reduce their parking requirement if they charge for parking at the site. This type of incentive is already written into the codes of a number of jurisdictions, both locally and elsewhere in the country.

Incentives involving property or business tax credits could also be applied to developers or employers, as applicable. Sites that charge for parking could also be exempted from an additional parking tax, if a jurisdiction imposes such a tax.

3. **Educational Approach**

Option A: Include a question for employers on the annual report to jurisdictions asking about their cost of parking.

The point behind this proposal is to increase employer awareness of their parking costs. A survey conducted in 1991 by Metro of a small sample of employers demonstrated that those lessors who know the cost of the parking they provide are much more likely to have tried reducing their parking needs, or to demonstrate a willingness to do so.^{xix} Although employers are largely unaware of their parking costs, this question could cause them to either go to the developer to find out such information or, alternatively, a table similar to a tax table could be provided by the jurisdiction with generic costs for different areas and types of parking structures.

This proposal is designed more to generate awareness and thinking on the part of employers than to result in action. It is hoped that employers would make the leap from learning their own costs to charging employees for parking or negotiating a reduction in their allotted parking supply. However, there are several reasons why this may not be an effective strategy:

The CTR annual progress report may be prepared by a lower-level ETC. Although the company's CEO would presumably have to sign the report, the CEO may not pay much attention to each question in the report.

Information on generic parking costs by area may be difficult to produce. Land costs specific to each area would have to be developed.

The item on parking costs may be left blank on the annual report, especially if employers consider the information proprietary.

The requirement to divulge such information may be opposed by employers.

Option B. Workshops for Employers

This strategy involves educating employers about the cost of parking through workshops and distribution of educational material. These workshops might be tied in with the orientation sessions planned for CEOs about the CTR law and with training planned for ETCs and CTR program developers. This option may have the disadvantage of not inducing immediate results. However, educational efforts are perceived more positively than regulatory approaches.

RECOMMENDATIONS:

- Pursue educational and incentive strategies first to determine if CTR goals can be achieved without the need to require parking charges.
- Pursue the use of Congestion Management Funds available through the Federal Congestion Management and Relief and Surface Transportation Program for demonstration projects that provide incentives to encourage new and existing property owners to reduce parking supply and/or charge employees for parking.

Future Task Force Actions

All of the parking issues and recommendations discussed in this paper apply to local jurisdictions and their review of local parking codes. There are a few actions, however, that would need to be carried out by the CTR task force itself. These include providing statewide guidelines for local parking management programs, reviewing local experience with implementation of the parking recommendations adopted by the task force, and asking the state legislature to amend the 1990 Local Option Commercial Parking Tax, if there is insufficient progress toward achieving CTR goals by 1995. The task force would also be the focal point for planning and seeking resources for training on the CTR law, including education on parking costs.

RECOMMENDATIONS:

- Develop specific guidelines for employee parking management programs at new and existing worksites, including employee parking supply and charges in the Model Employer Programs (Spring 1992).
- Review local experience with changes in parking demand as reported in annual progress reports. Incorporate findings and recommend revisions to these guidelines in the task force's December 1995 report to the legislature.
- Ask the state legislature to amend the 1990 Local Option Commercial Parking Tax to include noncommercial parking sites, if there is insufficient progress toward achieving CTR goals by 1995. The task force may bring this issue to the legislature earlier, if appropriate.
- Plan and fund, in partnership with local jurisdictions, educational workshops and information materials designed to increase employer awareness about parking cost and its influence on mode choice. Explore the use of Congestion Management Funds available through the Intermodal Surface Transportation Efficiency Act. These information materials should be part of the orientation program for employer senior managers and the training for ETCs and employer program developers.

- Investigate aspects of the Uniform Building Code, fire codes, zoning codes, and other regulations that increase the costs and/or affect the practicality of providing covered bicycle parking and lockers/showers. Recommend changes that would allow these facilities to be provided in a cost-effective manner without compromising the integrity of the regulations.