

**CENTRAL CITY PARKING MASTER PLAN
STAKEHOLDER COMMENTS
Draft Policy Recommendations**

SUMMARY

1 Support the citywide goals of economic development, livable neighborhoods, achieving sustainability and improving public safety

The policy recommendations for Goal 1 seem to equate neighborhood sustainability and livability with a lack of parking impacts in the neighborhood. Neighborhood sustainability and livability is much more than that. While it includes parking, traffic volumes and traffic noise, it also includes access to jobs, goods and services, open space and much more. Objective 1.1 seems to recognize that view of sustainability and livability, but the related policies do not. The policies conflict with not only with other goals, such as Goal 8's promotion of alternative modes of transportation, but with Goal 1 itself and its call for "livable neighborhoods, achieving sustainability and improving public safety."

The report presents a hypothetical projected increase in demand and recommends planning to increase parking supply to meet this, rather than recommending policies to manage the demand. The recommendations indicate that perhaps comments made in focus groups with retail establishments and commercial office developers were given more emphasis than the data that was collected.

There is tension or conflict between Goal 1 and Goal 7. There needs to be recognition that parking needs to provide value to the customer.

There are conflicts between the policy recommendations for Goals 1 and 8. The conflicts should be identified and addressed, including a discussion of what goals will have priority or how the conflicts will be resolved.

Add a Parking Impact Fee or Commuter Fee to insure that Off- Street parking facilities pay into the cost of enforcement and maintenance of the on-street system, provide a transit option that allows a park once alternative that may not be right where you want to park but allows easy access to those points. As higher enforcement forces on-street abusers into off-street lots...hence freeing up the on-street supply resulting in decrease revenues from increased on-street enforcement a resultant increase in use should be realized by off-street providers because they offer longer stays at lower or market rate prices and avoid the costly mistake of the parking ticket. Something as simple as 10 to 20 cent surcharge per parking receipt paid by the user but collected by the facility and turned over to the city. Pay it into the Benefit Assessment District or a Parking Authority Fund. This includes City and State owned garages and Private Surface Lots.

This goal (in regards to economic development) will be in tension with goal 7. There will be times when maximizing parking revenue will hurt economic development.

Livable neighborhoods and promoting parking for unlimited volumes and invariable resulting speeding traffic is an oxymoron. It is well known and demonstrated that livable neighborhoods result from creating safe, well lighted, walkable and business environment that meets local residents needs--people and eyes on the street, **reducing** vehicles not increasing them! . The **opposite** is being emphasized over and over in this report.

1.1 Ensure that adequate parking is provided with new development to prevent adverse impacts on existing land uses and to support a synergistic mix of land uses including office, residential, retail, restaurant and entertainment;

More parking encourages more cars, further eroding public safety by causing more air pollution and making walking and biking even more challenging. It is completely incompatible with smart growth and walkability.

Please eliminate parking minimums; let the market and free, private enterprise provide for needed parking. The City of Sacramento should not be in the business of providing parking other than the most basic access such as emergency vehicles, transit, loading zones and handicapped accessible parking. Residence should not provide automatic free parking permits; a compromise might be allowing local residents and business owners an option to purchase market rate parking permits. Bicycle parking would be a bargain.

1.1.1 Maintain current parking minimums for non-residential development

Parking minimums should be decreased or eliminated, not maintained. There is no evidence that parking minimums support this goal. San Francisco allows development with no parking. If we want a vibrant Central City, we need people on sidewalks, not in cars.

If these were properly calibrated would there have been a need for this study? How does a status quo approach improve the situation?

When referring to similar cities, do not make the mistake of including cities that have far better transit alternatives than we do, that have allowed those cities to reduce the parking requirements...because of those transit alternatives...we are far from those goals of cities such as Portland, Boston, Seattle, Vancouver etc. As we attain better levels of services for transit alternatives we can adjust accordingly. Goals need to be established that reflect a commitment to attaining better alternatives, hence allowing for lower parking requirements. That being the case the current baseline parking requirements should reflect where we currently are with transit not where we aspire to be.

1.1.2 *Increase the parking minimums for residential development to match parking demand in other similar cities and observed conditions in Sacramento*

Minimum parking requirements take land out of development, which forces up the cost of building on whatever land remains. Rents are higher than they would otherwise be. Minimum parking requirements make smaller, moderately priced apartments difficult to produce.

Parking minimums for residential development should not be increased. Parking minimums increase the costs of residential development, and do not support this goal.

Lower the parking minimums for new residential developments to match parking requirements in the urban cores of other similar cities.

Current residential parking minimums should not be changed. In the Central City, the current parking standards of 1 or 1.5 parking spaces per residential unit are appropriate based on our experience as Central City developers and residential property managers. In the future, residents will rely less on their cars as more restaurants, amenities and retail stores are added within walking distance of downtown residences.

We ask that parking minimums for office development be eliminated, and that the City not increase the parking minimums for residential development. Neither of these recommendations recognize recent progressive studies and writing. Thus, we object to *Policy Recommendation 1.1.1 and 1.1.2*.

Sacramento needs tight parking maximums (government 1 space per 750 employees for all). Employers can look to the market and not be required to subsidize employee parking. Instead they can use travel demand management strategies through the TMA's, and reduce the need to park by helping to provide employees with passes to use better, more frequent transit service.

1.1.3 *Require off-street parking for all retail development in the central business district (C-3 zone) and in the arts and entertainment district unless adequate publicly available off-street parking exists within a 1,000 foot radius of the subject site*

Off-street parking should not be required for all retail development. If this policy stands, it should include consideration of on-*and* off-street parking within a radius of 1,500 feet or 2,000 feet, and not the 1,000 feet proposed. We shouldn't be afraid of expecting people to walk a little more—in fact, public health would benefit if they did.

The rationale for reducing parking minimums is different in 1.1.3 and 8.1.

Hours of operation must match, i.e. a garage that is closed at 10:00 p.m. will not help park a bar.

Require **NO** off-site parking for all retail developments in the central business district C-3 Zone and in the arts and entertainment district.

Under this proposal, small retail projects more than 1000 feet (less than 3 blocks) from publicly available parking will not be feasible. Small retail is an essential element in Central City neighborhoods and small retail properties often lack the width or depth required to provide on-site parking.

The definition of "publicly available" parking should include valet parking. Valet parking increases a parking capacity. When determining the number of "publicly available" spaces being provided, sites with valet should be credited based on the number of cars they can valet park.

1.1.4 Require that at least one space per unit be provided onsite for residential development

This is pointless and does no good when the residential property owner requires tenants to pay high prices for the spaces OR turns around and rents those spaces to commuters or customers of regional businesses which happens now!!

1.2 Adopt City policies and standards that support new development in the Central City

Change to require mandatory parking construction.

1.2.1 Remove limitation on the maximum amount of parking that can be provided with new Central City development

Regarding policies 1.2.1 and 1.2.2, they tie in with enforcement after 6:00 p.m. The City allowed restaurants to go in and the businesses did not provide enough parking for employees and patrons. Tickets are only a bandage for the larger problem at hand. Remove section 1.2. Create after hours parking or full time parking patrols. Developers can opt out of providing parking.

Mixed Residential and Commercial parking is hard to guess. When this building was built no parking was required because there was plenty of parking for commercial tenants in the area and seniors didn't need to drive. Now I have 46 law offices with 58 employees and 187 senior apartments. None carpool 3 walk and 2 take light-rail. I have 17,000 sq ft of office space. 3000 sq ft is vacant. Under the current minimum / maximum only 28 to 38 spaces would be required for the commercial space. This does not leave any room for clients. However, in my case the residential would more than make up for the difference because very few of the seniors are capable of driving. Four own cars.

The report states, in the section Impacts of Future Development on Parking Supply / Demand Relationship, Office Development: "The parking demand

associated with office development can be generally satisfied if parking is provided at the current minimum parking requirement of one space per 600 square feet of development."

Yet, the recommendation is to remove the limitation on the maximum amount of parking that can be provided with new Central City development.

Limits on maximum amounts of parking should not be removed. Sacramento should be a city we want to live in, not just park in. Sacramento parking policies should not be driven by other cities willing to sacrifice their quality of life and sustainability because of shortsighted fears and misapprehensions about losing economic development.

At the last meeting, I expressed RT's primary concern related policy recommendation 1.2.1 which states Master Plan intention to "remove limitation on the maximum amount of parking that can be provided with new Central City development." RT is not satisfied with the response provided. This policy conflicts with other City/RT policies related to excess parking viz transit provision. The study has already indicated that there is overall, adequate parking to meet current needs in central city. We would like to discuss this issue further.

Policy recommendation 1.2.1 does not consider car-sharing, transit availability and dining and entertainment options within walking distance. That policy, which reads, *Remove limitation on the maximum amount of parking that can be provided with new Central City development*, conflicts with Goal #5: *Minimize the negative effects of parking*. A negative effect of more parking is that it accommodates more cars, thus causing more traffic congestion and worse air quality.

We ask for data from the buildings that have been built since 1990, complying with the City parking maximum limits, giving their available parking concerns.

If this policy is adopted, it should be rewritten to include the provisions that any development approved with more than the maximum amount of parking be required to include in its Transportation System Management Plan all the currently best available travel reduction and parking management programs, systems and facilities, including, but not limited to, complete transit subsidies and Sacramento TMA Concierge Membership.

Parking maximums should be used in all zones rather than minimums (1.2.1)

1.2.2 Adopt City policy and guidelines to allow for "in-lieu-of-parking" fees for development of less than the minimum required parking

Fee should correspond with cost to construct a new space.

Not sure that in-lieu-of-parking fees are good. Would not favor this. Old Sacramento should be exempt from the fees.

The concept of “in-lieu-of-parking” fees should be pursued. If a variance is given to reduce the number of required spaces, the developer should pay for this. The funds should be used by the City to offset the effects of insufficient parking, such as the alternate modes program. If a variance is given on parking spaces, then there should be no opportunity for a waiver of an “in-lieu” fee. In addition, when variances are given to reduce the required number of off-street parking spaces, the residents of the project should not be eligible for on-street parking permits.

If Policy Recommendation 1.2.2 is adopted, please have the fees go for public improvement in the area. If the fee is less than the cost of building the space, that's an acceptable deal. The developers then can spend more money on the actual project.

Approximately 25 American cities are actually doing this, including Orlando, Florida, and Chapel Hill, North Carolina.

1.3 Allow flexibility in City policy to tailor requirements to the nature of new development proposed

Should require written agreement with City as third party beneficiary to ensure ongoing availability.

1.3.1 Modify Zoning Code to permit reduction of parking minimums when convincing evidence of vehicle trip demand or shared parking can be demonstrated that will reduce the need for new parking

2 Supply parking to meet need

Several of the goals or related policies conflict. For example, Goal 2, “Supply parking to meet need” conflicts with Goal 5, “Minimize the negative impacts of parking.” The conflicts should be identified and addressed, including a discussion of what goals will have priority or how the conflicts will be resolved.

Conflicts with Goal 5 (Minimize the negative impacts of parking).

Restate, drop or combine with another goal. The real “need” is to create a livable community by reducing the need for parking by promoting alternative modes of transportation and creating more walkable communities.

- Reduce and manage demand for work trip parking.
- Shift provision of parking spaces to private developers and create incentives to reduce need.

First, let me say that I find the approved goal statement here slightly troubling -- "supply parking to meet need." How did it get to be a public obligation to supply parking?

Sure, if this were LA in 1965! Are we serious? Has anyone heard of "smart growth," which is supposed to be the basis of our updated general plan, and

which this flies in the face of? The goal should be to reshape demand. Get people on buses, trains, bikes, and on foot. Work with employers to encourage their employees to take transit.

"Need" should be defined. If need is "demand" then this goal as written says the City will increase parking as demanded.

Progressive demand management and trip reduction strategies are severely lacking in the policies recommended to support this goal.

This goal conflicts with Goal #5: *Minimize the negative effects of parking.*

2.1 Use parking minimum (ratios) to ensure developers provide most of the new parking needed;
(See Recommendations from Section 1)

Use of minimums is not a good idea.

2.2 The City of Sacramento should act as a broker when feasible to supply parking when the private sector does not;

2.2.1 Act as a broker for agreement among business owners to supply additional publicly available parking in the Mid-town entertainment district either by constructing new parking or by making private parking available in the evenings and on weekends

Delete 2.2.1 requirement for entertainment district to construct new parking. Consider creation of a benefit assessment district to fund small colorful trolley buses circulating throughout the entertainment districts for evening entertainment. (Similar to downtown St. Louis.) Hotels could financially support this. Why just have these for the Jazz festival?

Should require written agreement with City as third party beneficiary to ensure ongoing availability.

Drop the word "new." Should read: Broker an agreement to supply parking in the Midtown entertainment district (particularly 2700 block of J Street).

Have the City take over lot at 20th Street. Have the City force owner to rent at night.

2.2.2 Consider brokering agreements among businesses owners to supply additional publicly available parking in other areas as the need arises

2.2.3 Consider use of a Benefit Assessment District to fund new parking where there is a deficiency of parking for existing commercial land uses

Absolutely not!! As the late Mayor Serna used to say, residents and some more recent builders in the central city are saying **(asking the city to take the lead)**

and other cities are finally doing, create a system of peripheral parking with continuous shuttle and minibus services to various special or even ongoing events. (A little of this is being done now with large buses to transport River Cats fans.)

2.3 Take a strategic approach to parking master planning that will allow short-term decisions to be made consistent with long-term strategies or plans;

2.3.1 *Formulate a City policy to permit interim use of vacant lots for parking with exemption from some or all of the requirements for long-term parking when there is a demonstrated need that is limited in time and is consistent with a longer-term master plan for the site and immediate area*

The temporary use of vacant lots for parking should be strictly limited to existing vacant lots and for a period of not more than 2 years with no extensions. Without such controls, such a policy would encourage demolition of structures by neglect to allow conversion to a vacant lot and then to parking. Proliferation of such parking lots could promote blight in our neighborhoods.

The term-interim use of vacant lots- in exempting from parking lot requirements. This city is littered with lots that have been grand-fathered in to being non-compliant with existing rules. Others keep springing up such as 17th & J that are out of step with Zoning, Central City Guidelines and yet they exist. Who's going to track entitlements to these? Who's going to force the issue when these get "flipped" to a better use because of escalating land values and that parking is lost but yet some parties have their parking entitlements beholden to those lots. When are we going to "sunset" the grand father clause so that we start seeing fewer of these Black Top or Chip Sealed lots with no trees, landscaping, proper drainage, stripping, curb cuts w/ driveways across pedestrian areas where they are not suppose to be? How long is interim? What's the payback to the city? Look at the lots on I street between 13th and 14th ...they are an embarrassment.

Whenever you add parking lots, be sure to plant shade trees and/or solar panels like those at CalEXPO.

2.3.2 *Consider extending the five-year surface lot permit to eight years when need for parking can be demonstrated and all code-required improvements are made, and require that existing non-conforming lots meet requirements and a permit obtained for continued use*

a. First clause: NO! NO! Once again you are setting the stage for blight and parking in perpetuity. We are told that there is no money for staff to enforce planter strip or tree maintenance. Look at the dead or non-existing planter strips on stand alone parking lots.

Have any of you ever taken a walk (or even a drive) west on I Street from 17th Street past the Memorial auditorium to the Planning and Fire Department building at 13th? Those four-in-a-row existing blighted vacant and periodic surface parking lots in been there with the majority undeveloped or disappearing

businesses for **30 or more years** extending the distance pedestrians have to walk and creating a vast deserted unsafe gap--defeating the walkable community concept !!!

b. Second clause: Good! This could help. " . . . **require that existing non-conforming lots meet requirements and a permit be obtained for continued use.**"

2.4 Provide adequate monitoring of parking supply and utilization to be able to identify deficiencies or conflicts when they develop.

2.4.1 Conduct occupancy counts for all publicly available parking in the Core (Focus Area 1) and Midtown (Focus Area 2) at least every three years to identify deficiencies

2.4.2 Track additions and subtractions of parking and parking variances as new development occurs

The City should maintain a database of on- and off-street parking spaces, numbers of parking spaces required for new development, and variances as new development occurs. Without such a system, there is no way to verify the potential impact of a proposed parking variance or to determine whether the same alternate parking spaces are being improperly counted by multiple development projects.

2.5 Pursue opportunities to increase the amount of parking provided by existing facilities

Resist the temptation to excessively reduce size of spaces to increase number or nobody with a van, SUV, or pickup truck will use them.

2.5.1 Consider striping spaces in un-metered on-street parking to increase the number of parking spaces provided

2.5.2 Consider re-striping on-street and off-street spaces to increase the number of spaces provided

2.5.3 Consider use of angle parking on streets where the angle parking will not interfere with safe traffic operations

Where angled parking is considered, the back-in version should be encouraged. It is safer for both oncoming drivers and cyclists because greater eye contact is possible between the drivers of the parked vehicles and those of oncoming traffic.

3 Use time limits, rates and enforcement to manage parking supply efficiently

Parking is a major limitation on the property value in Old Sacramento. Old Sacramento wants free customer parking for first two hours. We know from professional studies, we and the City have commissioned, that less costly and more available parking in Old Sacramento are critical to our future success. The

studies are the Retail Study by Fransen & Company released early in 2005, the marketing study released in July and the phone interview of 300 telephone respondents released in July. All point to costly and real or perceived scarce parking as a major impediment to gaining more sales from locals. Additional sales tax revenues from increased retail sales are worth the cost of free parking. "Prepaid" does not work for Old Sacramento. Old Sacramento has met for a year and the solution they have come up with is the first hour or two free. Old Sacramento needs help right now.

When do their comments and recommendations get added – "Free Parking". Can the City do a pilot test of the free parking?

Old Sacramento is one of the biggest economic engines and is a big draw for tourism. It is not like Midtown. Old Sacramento is a special area.

The issue is peak management. The parking policy should encourage people to visit in the off-peak. Enforcement is an example. The heavy enforcement should be in peak period. Tickets in the off-peak just make customers angry.

Enforcement just needs to be more customer-friendly

The issue presented seems to be "How to deal with parking during peak times?" The more important issue is establishing a parking policy that promotes business during off peak times. Old Sacramento is highly underutilized by potential customers Sunday through Thursday evenings and Monday through Friday days. Every good-weather Friday everybody shows up at once. Peak demand is definitely a problem.

Business owners are not providing enough parking for their employees. Employers have a responsibility to provide parking for their employees. This is not addressed adequately in the draft policies.

3.1 Establish priority for parkers for each type of parking;

Consider certain blocks of resident-only parking like UCD Medical Center and City College neighborhood.

- 3.1.1 Recognize residents as the priority in Residential Parking Permit area and shoppers, visitors and other short-term users as the priority in Core on-street and City-operated off-street parking in Downtown Plaza and Old Sacramento***
- 3.1.2 Set target mixes of short-term and long-term parkers in other City-operated garages to establish priorities for parkers***
- 3.1.3 Recognize commuters and other long-term parkers as the probable priority in other off-street facilities***

How to implement?

- 3.2 Use time limits to make sure priority parkers can find parking;**
3.2.1 Where appropriate, reduce the time limit from 2 hours to 90 minutes to discourage employee parking
3.2.2 Reduce time limits for long-term on-street spaces to five hours to facilitate use of spaces by commuters employed in the immediate area

How does a 5-hour limit help a commuter with an 8-hour work day?

- 3.3 Establish rates that encourage efficient use of spaces;**
3.3.1 Use rates to maintain occupancy rates in City-owned facilities at or below 85% of total capacity to insure adequate access to parking for priority users

There are serious inconsistencies in the report. Objectives 7.1.1 and 3.3.1 state conflicting goals in pricing city managed parking.

7.1.1 says fees and fines will cover capital and operating costs and generate additional revenue. 3.3.1 says rates will be based on maintaining occupancy rates at 85%. These two policies may conflict.

Policy 7.1.1. says fees and fines will cover capital and operating costs and generate additional revenue, while 3.3.1 says rates will be based on maintaining occupancy rates at 85%. This is a serious inconsistency in the recommendations.

Objectives 7.1.1 and 3.3.1 state conflicting goals in pricing city managed parking.

Policy 7.1.1. says fees and fines will cover capital and operating costs and generate additional revenue, while 3.3.1 says rates will be based on maintaining occupancy rates at 85%. This is a serious inconsistency in the recommendations.

- 3.3.2 Reduce the effective short-term rates in the Core area off-street facilities through an expanded merchant validation program to encourage use of the off-street spaces by shoppers and visitors and to reduce the overall demand for on-street spaces*

Favor Recommendation 3.3.2, but not 3.3.3 – Old Sacramento just raised on-street rates. There is a lot of abuse of meters with disabled parking.

Merchant validation has not been very successful in Old Sacramento. Professionalism of the businesses in Old Sacramento is not that high. This has limited the merchant validation. Hope that one or two hours of free parking will bring in a critical mass of customers.

There are other ways of doing the merchant validation program other than two free hours that should be considered. Other cities are discounting historical retail areas: the Gas Lamp District in San Diego - 1 hour retail access and Old Pasadena

- first hour free. Pre-paid parking on Friday and Saturday makes merchant validation difficult.

Why should non-drivers have to subsidize parking? It is clearly not fair for people who take transit, walk or bike to pay more for goods and services because other customers are getting their parking costs subsidized. How is this equity issue addressed?

This assumes peoples parking choice is price-sensitive. What if people want to park closer to their destination even if the price of the alternative off street parking is zero?

3.3.3 *Increase the on-street meter rates in the Core area to discourage long-term use of Core area metered spaces by commuters*

This is a good policy, but should explicitly mention that rates be raised if parking occupancy exceeds 85%.

If you raise it high enough to discourage long-term parkers, might it not also discourage short-term shoppers and restaurant patrons? Seems like a time limit at a reasonable rate would be better.

3.3.4 *Increase rates at long-term metered spaces to reflect the rates for nearby off-street facilities*

3.4 Enforce parking restrictions and regulation to ensure the appropriate use of on-street parking;

3.4.1 *Strictly enforce Disabled Parking, Loading Zone, Residential Permit Parking, time limits and metes throughout the Central City*

4 Modify the Residential Parking Program to manage the retail/residential interface

Is street parking a right? There may be instances in urban settings where commercial use of these spaces is appropriate.

4.1 Operate Residential Permit Parking (RPP) areas in a way that protects the residential character of the neighborhoods and ensures adequate parking availability for residents while also supporting the needs of small, neighborhood-supporting business located in or adjacent to the areas;

Regarding 4.1 and 4.3, City expanding its involvement to include selling on-street parking rights to commuters in a residential permit area--City's long history of owning the rights to parking meter revenues on streets is one thing, but "selling" paid permits to commuters/business or government employees to park in residential permit areas is far different and new idea.

- 4.1.1 *Extend parking restrictions and enforcement in Residential Permit Parking zones beyond 6 P.M.*
- 4.2 **Adopt policies that provide greater consistency and clarity in the Residential Permit Program areas;**
 - 4.2.1 *Modify RPP ordinance to establish criteria for creating new zones or annexing neighborhoods into RPP zones*
- 4.3 **Provide employee permits in Residential Permit areas if there is a surplus of parking (criteria to be defined).**
 - 4.3.1 *Identify blocks in RPP zones where there is surplus daytime parking (criteria to be defined) and sell a limited number of day-time parking passes to local businesses for employee or customer parking*

The concept of granting surplus residential parking permits to businesses within RPP zones should be strictly limited to (1) employees or customers of businesses located within the RPP zone, (2) times of day when residents are not likely to be home and (3) should never be allowed for commuters who work in major office buildings.

Local business?? Define...Define surplus supply...If it is illegal for an individual to sell their permit...even if they aren't using it...in a residential zone...Why would it be legal for the city to do just that?? With regard to existing residential zones, the city already allows for business owners, who register their cars at a place of business within that zone, to apply for a free decal. They also allow property owners the right to purchase one visitor permit for the property they own. This seems far too prone for abuse...at first glance.

Such a proposed program should be tried in a pilot first with annual reports back to council. It is untested with no precedence and is subject to fraud, abuse, many mistakes, misjudgments and unfair decisions and other potential problems.

A simpler, less costly method for generating revenue is to levy a surcharge on commuter and customer parking spaces--private or publicly owned. This small charge should be levied and paid for by including it in the parker's fee for each used private or government owned space to add to the fund proposed.

Deposited in or credited to the proposed Parking Enterprise fund it would generate needed revenue for enforcement, shuttle and street lighting projects and could influence driving and parking behavior modification.

5 Minimize the negative impacts of parking

Several of the goals or related policies conflict. For example, Goal 2, "Supply parking to meet need" conflicts with Goal 5, "Minimize the negative impacts of parking." The conflicts should be identified and addressed, including a discussion of what goals will have priority or how the conflicts will be resolved.

Goal 5 conflicts with Goal 2. One of the best ways to minimize the negative impacts of parking is to minimize the space devoted to parking. That conflicts with the Goal 2's "Supply parking to meet need."

There needs to be more policies to reach the objective of minimizing the land devoted to parking in the Central City. Possibilities include establishing parking maximums (as opposed to the continuation of minimums proposed as policies for Goal 1) and requiring that structured parking be underground.

Goal 5 should be given a higher priority and become Goal 3.

The Maximum parking standards for private office projects should not exceed the present maximum standards for government buildings. All should be required to have membership in a TMA as a condition of approval of the project. New development should be required to contribute to a benefit assessment district or pay an annual fee per parking space (similar to rental owners pay fee per unit) to mitigate impacts.

5.1 Minimize the visual intrusion and other negative environmental impacts of parking;

5.1.1 *Maintain existing requirements for lighting, landscaping, drainage and other improvements for permanent new parking*

Address shade tree requirement here for both sidewalks and to retrofit existing parking lots.

The City should add requirements to upgrade existing parking to meet current requirements for landscaping, lighting, drainage and other improvements when the property changes ownership. In addition, tax rebates should be offered to encourage such upgrades. Among the landscape requirements, emphasis should be given to the addition of canopy trees to shade paved surfaces.

5.1.2 *Adopt City policies to encourage use of ground floor for retail in new parking structures*

5.2 Minimize the land devoted to parking in the Central City;

But if the point is there is a shortage of parking, does it make sense to ban construction of new parking? Requiring parking on new buildings helps going forward but does not address current shortfalls.

Seems contrary to perceived lack of spaces.

5.2.1 *Maintain existing City policy to prohibit the addition of new stand-alone parking without associated parking-generating uses*

5.3 Reduce the adverse impacts of commuter parking in residential neighborhoods;

(See Recommendations from Sections 1 and 4)

All stick, no carrot. Why not allow legitimate commuter parking and charge a fee towards overall parking program? You could allow permits to park on private lots and charge landowners a fee (see 2.3). We do something like this for baseball games here.

6 Make parking safe, secure, attractive and convenient

There is an opportunity here to address bicycle parking in a more comprehensive manner. Providing better bicycle parking is a way to decrease the demand for automobile parking and is at least 10 times more cost and space efficient.

It is known that everyone benefits from streetlights including commuters, business employees and regional business customers. One of the reasons central city on-street parking is compacted, and creates a problem is that both residents and business customers want to park where drivers and their cars are perceived to be safe.

People need to feel safe. Midtown is pedestrian friendly at night, but near 15th and 16th Streets it does not feel safe at night. We still want to encourage walking. Look at setting up urban walk and include regular patrols, better lighting, etc.

6.1 Provide adequate maintenance of City-owned parking so that it is safe, secure, clean and attractive for its users

6.1.1 Use Parking Fund to ensure adequate maintenance, cleaning and security of the City's parking assets

6.2 Make the use of on-street and other City-owned parking easy and convenient through information, good signage, convenient payment options, and logical access and exit points.

Off-street parking sometimes is not visible or clear. Something you should consider for the signage goal is to put a sign up that says off-street parking is available and where it is available.

6.2.1 Include information on privately-owned but publicly available parking on the City's web site

6.2.2 Provide additional information and signage for bicycle parking in publicly available parking facilities

Calls for "information and signage for bicycle parking in publicly available parking facilities." One of the advantages of cycling is the ability to ride right to your destination and not look for a place to park and then walk from a parking lot. Convenient bicycle parking is located at destinations, not at centrally located "facilities", which I assume are garages or parking lots. There's nothing wrong with having well-signed bike parking in parking garages or lots, but this should not be the be-all and end-all of bike parking.

Short term bicycle parking (usually bike racks) for visitors should be located near entrances to buildings in high visibility areas. This parking should be dispersed throughout the central city. Long term bicycle parking for employees should be more secure, which usually means bike cages or lockers and in a location convenient to bike commuters. Suggest policies be added for these needs.

Recommend adding as a policy the elimination of the dumping of green waste in the street as a way to make parking more attractive and convenient and obtain additional space for parking.

Recommend adding a policy that major events above a certain size must provide valet bicycle parking. San Francisco has such a policy.

Recommend adding a policy that standardized bike parking signage be adopted. A proposal for such signage (letter "P" on blue background next to bike graphic) was previously furnished.

We find Policy Recommendation 6.2.2. inadequate. A progressive policy recommendation would be that major events in the central city provide valet bicycle parking. More people can attend, with the least space devoted to accommodate their transportation choice, with valet bike-parking.

During the spring 2005 bicycle campaign, 65 cyclists submitted comments about convenient bicycle parking at retail and secure parking at offices. Representative comments included:

- "The city should encourage more stores and doctor's offices to provide bicycle racks."
- "More bike racks at businesses and other establishments would really make cycling more convenient."
- "I ride my bike all over town to get my errands done and there are very, very few businesses that even have bicycle racks/ parking. Usually I have to find a "no parking" sign to lock to."
- "There is a need for more "high-security" bike lockers. There are many people with nice bikes that don't trust locking them up in a bike rack."
- "Need better and more available bike parking at offices. Cyclists should not be an afterthought when it comes to commuting, cycling should be encouraged and promoted by all employers."

6.2.3 Pursue additional branding of the City's parking facilities

6.2.4 Consider dynamic parking information system to help shoppers and entertainment customers locate available parking

6.2.5 Continue to replace old meters with new meters or pay stations that accept multiple payment methods including coins, bills and credit cards

**7 Operate City-owned parking in a financially sound manner
Ensure that the City's parking program is financially self-sufficient;**

Restate to use fees to support transit operations, bicycle and pedestrian improvements and TMA operations.

There is tension or conflict between Goal 1 and Goal 7. There needs to be recognition that parking needs to provide value to the customer.

Recognize that parking structures next to or in the same buildings as uses reduces the interaction of people on the sidewalk and the economic vitality of cities.¹

The city should work towards a regional pricing plan for parking.

We request that the consultants include our recommendations. We also support staff consideration of the recommended changes in the comments of the TMA's, SABA and the neighborhoods.

But what happens if/when the optimal rate structures from a policy perspective (see 3.3) differ from those required to maximize revenue? Policy should govern. Do not forget opportunity costs, environmental effects and economic effects of inadequate parking.

I disagree. Look at putting extra money from fees and forfeitures to alternative modes, thereby freeing up more parking spots.

7.1.1 Set parking fees and fines at levels that cover capital, operating, maintenance and enforcement costs and generate additional revenue to expand the parking program to meet the growing needs of the City

There are serious inconsistencies in the report. Objectives 7.1.1 and 3.3.1 state conflicting goals in pricing city managed parking.

This policy says fees and fines will cover capital and operating costs and generate additional revenue. 3.3.1 says rates will be based on maintaining occupancy rates at 85%. These two policies may conflict.

Policy 7.1.1. says fees and fines will cover capital and operating costs and generate additional revenue, while 3.3.1 says rates will be based on maintaining occupancy rates at 85%. This is a serious inconsistency in the recommendations.

**7.2 Offer City-owned public parking at a rate that recognizes the cost of providing parking and the economic value of the parking;
(See Recommendation 7.1.1)**

Should recognize the need to provide a quality, high value parking experience.

¹ Michael Manville and Donald Shoup, People, Parking and Cities, *Access, Transportation Research at the University of California*, Number 25, Fall 2004.

7.3 Provide parking discounts when they reflect appropriate incentives for the use of City-owned parking and when the discount is financially feasible;

7.3.1 *Maintain discounts for the disabled (free on-street), low-income workers, part-time workers and shoppers where appropriate*

The parking enterprise fund should also support improvements in neighborhoods impacted by parking and specifically mention use of the funds for bicycle parking as a way to reduce parking demand. Money collected from meters should go to business or residential neighborhoods for use in repairing sidewalks, planting trees, providing bicycle parking, security or other street improvements.

7.4 Structure the financial accounting from parking and parking enforcement with sufficient flexibility to allow maximum effectiveness in the parking program;

Be sure that we are not recommending that all parking revenue goes into general fund because it is pooled.

The details are sketchy, and it should be tried for at least three years before adopting it as a permanent policy. Some considerations and potential flaws I see (and there are no doubt many more) are:

- 1) Covered parking structures require more maintenance and are more costly to operate and maintain. If revenues from those structures are insufficient to cover their costs, the deficit would have to be subsidized from residential permit sales to commuters and parking permit sales.
- 2) Both uncovered and street residential permit parking require less maintenance but the costs are in enforcement for which there is no estimate because the system of selling commuters permits has been untried. In a budget crunch, enforcement would be the first to be cut just as the city has cut traffic enforcement in the Police Department, contributing to speed and other traffic violations.
- 3) In the past some city garages have operated at a loss or barely broke even. The merging of all funds into one pot would obscure that fact and provide a subsidy for poor management.
- 4) There is no provision to preventing revenue diversion from such a fund, if it became financially successful beyond projections, to the General Fund to support other services such as police and fire as they did revenues from preferential parking enforcement. If citizens then objected to the funds transfer, council and city managers would accuse them of wanting to defund public safety.
- 5) There is no provision to assure continued funding of a project within the "Parking Enterprise Fund." As an example, lets say that residents agreed to relinquish some of their preferential street parking (which is now arguably being contended that there is a "surplus" on some streets) based

on the condition that street lighting was included as a project in the Parking Enterprise Fund to receive some of those revenues.

So this would be a good use, but there are no prohibitions against contributions to that project being diverted to parking garage or shuttle project deficits (if the latter were to be included in Parking Enterprise Fund). Who, how and by what guidelines would a choice decision be made?

The best idea to date! No longer use parking funds for other uses. Put all parking revenue into one parking fund. Use funds for parking programs – new parking and enforcement.

- 7.4.1 Combine all revenue from City-owned parking and parking enforcement into a single Parking Enterprise Fund.*
- 7.4.2 Use the combined Parking Enterprise Fund to support all City parking programs or other programs to accommodate or reduce parking demand*
- 7.5 Maintain all City-owned parking facilities and revenue collection equipment for maximum effectiveness and efficiency;**
 - 7.5.1 Maintain revenue collection equipment for on-street and off-street operations and replace where appropriate*
- 7.6 Provide operational policies and procedures to ensure that the City’s parking program is run effectively, efficiently and according to the highest standards of the parking profession**
 - 7.6.1 Update the City’s employee manuals for parking-related functions*
 - 7.6.2 Enhance the financial and operational reporting capabilities to allow optimal financial management of the City’s parking assets*
 - 7.6.3 Replace the City’s parking validation system for shoppers with a system that is less susceptible to abuse and requires less administrative support from the City*

8 Promote alternative modes of transportation and walkable communities

There are conflicts between the policy recommendations for Goals 1 and 8. The conflicts should be identified and addressed, including a discussion of what goals will have priority or how the conflicts will be resolved.

The city should not use funds to promote RT park and ride. Park and ride lots at transit stations are contrary to smart growth and transit oriented development principles. The city should discourage cold engine starts and warehousing cars both in and outside the city.

All nonprofit organizations that promote bicycling, walking and transit use should be eligible for support.

Encouragement of the use of parking “cash-outs” should be added as a policy.

At the Sidewalk Symposium in Sacramento on August 31, the panelist from Rancho Cordova mentioned that her city has adopted walking as the PRIMARY mode of transportation, rather than an alternative. This is, of course, literally the case although easy to forget given our current reliance on vehicular transportation. Probably Rancho Cordova won't be reconfiguring itself any time soon in ways that make it obvious to any bystander that it favors walking as the primary mode of transportation, but I was fascinated by that policy choice. And it is certainly the case that walking greatly reduces the need for parking. If we DON'T adopt something this radical, how will we rationalize choosing design that meets the needs, amenity preferences, and convenience of walkers over design that accommodates the "need" for parking?

Goal number 8, meet all the other goals. Apparently, you've never met, because you have nothing in common.

Goal 8 should include, among other things, REQUIRING bike parking located IN FRONT of buildings, requiring bike lockers and showers in new buildings, etc.

Other parking opportunities, both interim and permanent may emerge and should be explored via an institutionalized relationship of cooperation between West Sacramento and Sacramento.

Midtown is very walkable, but as one gets closer to the center of the city, the sense of decay (and urine smell) increases. A sense of safety is paramount.

Remove on-street parking to provide east-west bicycle corridors. e.g. L Street from 15th to 3rd Street.

To encourage the walk from readily-available Zone 1 parking, which largely empties out after 6:00 p.m., to the restaurants and clubs in Zones 2, 3, and 4. Establish "corridors" which have more lights and security/police on foot. People will not park downtown at night if it is perceived as risky.

Please eliminate volume discounts on any publicly controlled parking space. Charge by the day or for shorter time periods to encourage commuters to choose other forms of transportation whenever possible. Renting parking by the week, month or longer period encourages commuters to drive even on days when they can conveniently use other forms of transportation. I want to move to a walkable city.

Support idea of employer subsidized transit, parking taxes for off-street parking that feeds multi-modal transportation. We have the seventh worst air quality in the nation. Ensuring future quality of life in the region means investing in transit. Price of land is too costly to spend on developing parking and favoring auto alternatives.

8.1 Reduce parking requirements when transit service to an area or opportunities for shared parking may reduce the parking demand

The rationale for reducing parking minimums is different in 1.1.3 and 8.1.

8.1.1 Modify Zoning Code to allow flexible parking ratios so less parking is required where transit availability is best and where mixed-use development allows for shared use of parking

I support a more flexible parking code. If we want professionals in new office space downtown there will be a greater parking requirement by tenants. Few professional people are willing to ride the bus in Sacramento. I loose prospective tenant all the time because parking is not available or it is too expensive. We should not be loosing developers to West Sac, Rancho Cordova or Roseville because of parking. If there is a concern about renting this space out and competing with current parking structures put clause in the building code prohibiting the renting out of those parking places and make the parking spaces part of each lease according to the sq ft leased.

I would replace "where transit availability is best" with "where development is adequately served by transit." RT considers the central city area adequately served by transit. Let's talk further about this.

The first goal should be the present Goal 8. This goal should be listed first to indicate its high priority and that it is the overriding goal for the City Parking Master Plan. All other goals should be measured against it. Add further objectives and policies to this goal:

- Increase the frequency of transit to maximum 7-minute headways in the Central City by 2025.
- Expand the hours of transit service in the city.
- Promote aggressive bicycle and pedestrian policies. Retrofit facilities for transit, bicycles and sidewalks. (See SABA comments.)
- Use parking fees to support transit operations, bicycle and alternative modes.
- Create benefit assessment districts or an overall city district to fund transportation demand management programs, car share, trading places programs, and shuttles.
- Aggressively manage work trips through TMA's. (See TMA comments)
- Retain 8.1, 8.1.1;8.2 and 8.2.1 and 8.3 and 8.3.1.

8.2 Encourage use of RT services to and from the Central City

8.2.1 Use City funds to promote the use of RT park-and-ride and transit services as a substitute for parking in the Central City

Parking funds should not be used to support or promote park-and-ride lots. These do not reduce vehicle trips, they merely shorten them, and often not significantly. Thus, we object to Policy Recommendation 8.2.1.

8.3 Support employer-based programs to reduce commute vehicle trips to the Central City

If you want to encourage carpooling, make the best downtown parking available to carpoolers only. A carpool lane on the highway is the incentive for the commute; give the choicest spots to the carpooler at a reduced or no-cost rate.

8.3.1 Use the Parking Fund to support Transportation Management Associations and employers in promoting alternative modes for commute trips to the Central City

9 Provide transportation options to encourage use of existing parking supply

Shuttles are expensive. If shuttles are used, they should be self-supporting. That is, the users need to cover shuttle operational costs.

9.1 Use the Parking Fund to provide transportation services that link Central City areas with surplus parking with areas of high parking demand/deficiency.

9.1.1 Consider using shuttle services to link available parking with popular trip destinations to address parking needs in areas without sufficient parking capacity

This reference to shuttles is too narrowly focused. It speaks only to "link available parking with popular trip destinations to address parking needs in areas without sufficient parking capacity."

While that most certainly should be one consideration--even one purpose or function-- it should not be implemented in isolation. There are 35,000 plus folks, including a high concentration of seniors and disabled, who live in the central city and have mobility needs day and night which are being ignored in this focus. The whole concept of shuttles needs to be viewed from what, when, where, why and who are using shuttles NOW, who could use them if they were available and how can shuttles could be incorporated into a COMPREHENSIVE permanent alternative mode in the city's parking and transportation system--at least central city for now. Incidentally, RT may not want to be the operator of the shuttle system. It could be a private experienced subcontractor. It would create driver jobs and may or may not be fare paying.

This will probably require a special study at some point later but it should happen very soon to link all of the resources and needs together. I have spoken to more than one smaller project builder in the central city who recognizes the need for an integrated shuttle system to support customers, residents, businesses

and parking. However, I believe that I am correct in that they look to the city to bring the concept into reality--someone with an overall view as to benefits and needs.

For example, right now I know residents who use and/or I see regularly different entities, businesses or facilities using smaller electric shuttle buses. A partial list includes: SHRA for its residents, Senior Facilities (Pioneer House, e.g.) Sutter Foundation, some social services, RT limited service for disabled, hotel shuttles, Ford Motor shuttle, (immediately outside the central city UCD Med Center has an entire fleet that regularly makes the rounds on its campus).

Back in the central city I even saw one bus that said Leader Pharmacy on it. The State uses large shuttle buses. There are probably other shuttles. For example, how do the many seniors get to and from the Hart Center at 27th & J? (The #30, 31 is an out-bus on one-way J Street. L Street is too far for most to walk to catch its return route and there is little to no north- south routes and return in midtown.) Sizable number of city and county government employees use no shuttles, but those commuters could probably benefit from one.

The present system is costly, uncoordinated, inefficient, part time only and fails to meet the needs not only of the current users but potential riders. The time for the fragmented and isolated overlapping and uncoordinated system to change has come, and the city will have to take the lead. That can start by expanding the concept in policy #9.

One opportunity that should not be overlooked is the possibility of building a gigantic parking garage as part of the railyard development -- divert as much HOV and other commuter traffic there and supplement with extensive (read:frequent) shuttle service. This might help minimize needs for short-term on-street parking downtown and in Midtown.

We object strenuously to Policy Recommendation 9.1 and 9.1.1. We do not believe the City should spend more public dollars to study the feasibility of, or to provide, shuttle systems. The most recent shuttle system recommended by a consultant, the RT/state shuttle from parking under the freeway to worksites, has been discontinued and operated at a serious deficit.

Use parking funds to fund shuttle service in downtown core (river to freeway, freeway to river).

800 parking spaces at the Ziggurat Garage in West Sacramento currently go unused. A more convenient and properly marketed shuttle could help.

Evening venue shuttle from under freeway lots to the Convention Center, Memorial Auditorium and area restaurants. It should be free.

General:

Do we know how much of the Saturday parking is the Embassy Suites? Embassy Suites uses Lot X for valet (181 spaces). The number of spaces in the inventory may be old.

Full build-out will increase Old Sacramento by 26% (of 645,000 square feet). There will be a building added soon (Orleans site) and Old Sacramento has been exempted from parking requirements. How will this be treated in the future? Will parking be required? Old Sacramento is a planned unit development.

Railyards and Crocker developments are good areas to look for supplemental parking for Old Sacramento on evenings and weekends. There are also a number of existing private garages that don't open up at night or on weekends.

Have the Old Sacramento Redevelopment Plan and Merge Redevelopment Plan been taken into account? (There are two places where parking can be added: The Orleans site and the Firehouse parking lots).

Parking for employees is a big issue in Old Sacramento. Priority for shoppers would be for Downtown Plaza and Tower Bridge and not for the Old Sacramento garage. That one is needed for employee parking. Can there be other options to address employee parking – "Parking Cashout"

A "Park-Once" policy transcends peaking or special events – that requires a shuttle.

The city needs to consider giving central city residential apartment owners some kind of incentive--perhaps an owner tax discount, building requirement or permit fee exemptions or other kind of incentive to build new covered parking such as garages or improve old garages to encourage tenant parking. The problem of owners renting parking spaces to non-tenants or for storage when their building permits were based on a tenant to unit ratio needs to be revisited. I know of many 150 plus unit buildings in LA and Long Beach where the first parking space is included free in the rental agreement but they sometimes charge for a second based on space available. Free spaces are always full. Their blocks are so long that residents have a very limited option of finding street parking.

The city needs to consider setting aside parking spaces for motorcycles (San Francisco sets a good example of this) and other alternative legal single occupancy electric vehicles.

There is a fundamental question overlooked. Should the city be in the off-street parking business? Why not let the market determine supply and rates?

The policy recommendations are somewhat timid, and at their worst, non-progressive and backward-looking. The policies assume that future conditions and transportation choices will look substantially like the past. (The section of impacts of future developments on parking supply / demand does make a brief mention that improved transit services and increases in the cost of automobile

travel may result in parking demand rates that will decrease “somewhat” over time.)

Additional context about the future should be provided by mentioning work done by the Sacramento Transportation and Air Quality Collaborative, the Blueprint scenario and other land use ideas and megatrends that will affect transportation such as increased energy costs and the need to deal with global warming. Also, one can project that central city residents of the future will tend not be like residents of the past. They will be older, have fewer children and be attracted to the life and vitality of the central city and to the need to drive less.

Additional context is provided by Donald Shoup’s groundbreaking book, *The High Cost of Free Parking*, which mentions these pertinent facts:

- Drivers park free on 99% of automobile trips
- Cars are parked 95% of the time
- The annual subsidy to car parking in the U.S. is from \$127-374 billion—a subsidy inequitably paid by everyone, not just drivers

Parking charges can put the city at a competitive disadvantage with other areas. That disadvantage results from parking costs being subsidized by employers and retailers elsewhere. The city should have a policy (it would fit under Goal 1) of pursuing equitable parking charges throughout the region and state, since providing parking is never free, but is rather a policy decision. We shouldn’t try to level the playing field by subsidizing parking. Others should end their subsidies.

The charm of European cities, and to some degree, San Francisco, Portland and Vancouver, comes not from their parking lots, but from the multitude activities of activities in close-knit central cities. We have an opportunity to choose a different future and should choose activity over warehousing cars.

What a disappointment! Instead of planning for the future using the successful experiences of other livable cities, as well as studies and research that demonstrate the benefits of reducing the need for parking, this report focuses on planning as usual. The authors appear to take past policies, add high projections for increases in future demand, and then try to figure out how to meet that demand. It ignores future economic and demographic projections. Past policies are just projected into the future.

The policies as stated do not support the goals.

Multiple academic studies show denser development, less dependence on auto transportation and less parking provide greater economic benefits and increase the livability of cities. Storage of cars is a poor economic use of valuable city land.²

²Michael Manville and Donald Shoup, *People, Parking and Cities*, *Access, Transportation Research at the University of California*, Number 25, Fall 2004. Access Spring 2005.

Reduction in parking space requirements and increased parking pricing for work trips can reduce development costs and employers' subsidy of employees parking. This can result in higher income for employees.³

The City Parking Master Plan must include the specific impacts from the three Caltrans HOV projects. These projects, if approved, would be the source for very high demand for future parking and they will substantially increase the negative parking impacts throughout the city. Precise demand figures from each of these projects must be identified for the City Parking Master Plan to have any validity. This should be done before the plan goes again to the City Council. ECOS is very concerned with the lack of focus and priorities for the goals.

My two overarching comments are: (1) the policies all sound good in isolation but in some cases are potentially contradictory, so the ultimate document should discuss how to reconcile them; and (2) there is no mention made anywhere regarding cooperating with the city of West Sacramento, even though our respective parking challenges overlap in Zone 1 and potentially elsewhere.

My sense from the meetings I've attended is that there has been an extraordinary effort made to listen to the opinions of the many diverse stakeholders in the Central City. While it is important and admirable to listen to all affected stakeholders, I think the city should avoid the pitfall of trying to structure the ultimate policy document to appease all of them in every instance. For example, while some residents would like to have a suburb-like wide-open street parking environment, the fact is they've chosen to live in an urban neighborhood and from a policy perspective it may well be appropriate for the patrons of the bar down the block to park on the street in front of their house. To create a coherent policy and a document that serves the overall good of the city, the council may need to create isolated "winners" and "losers" from the perspective of individual interest groups.

There is no mention anywhere of potential cooperation with West Sacramento, e.g. use of Ziggurat garage or potential interim use of future city-funded garages before full local utilization.

Add: Construction of new residential units normally requires provision of 1 to 1.5 new off-street parking spaces. However, over time, such spaces are often converted to storage or are leased to commuters, thereby adding to on-street parking problems. The City should adopt a mechanism to maintain the link between residential units and required off-street parking spaces. For example, demonstration that the parking space(s) are still available for parking uses could be required when a residential unit is leased or sold.

Add: The number of on-street residential parking permits granted by the City should be limited based on available supply in the immediate area (e.g., within a

³Robert Johnston, Michael Clay and Shengyi Gao, "Modeling Long-Range Transportation and Land Use Scenarios for the Sacramento Region, Using Citizen-Generated Policies," UC,Davis Department of Environmental Science and Policies. Mineta Transportation Institute, May 2005.

4-block radius). As residential density increases, there is no comparable increase in on-street parking, causing increased shortages and congestion.

Add: Once development increases so as to be close to available supply, units in new residential development should not be granted on-street residential parking permits, since the new development should be required to supply sufficient off-street parking.

Add: Off-street parking required for residential units should be designated as “accessory” to the residential unit(s), to prevent them from being sold for use by other off-site purposes.

Add: Variances to the requirement to provide parking spaces for residential and retail development should not be granted in areas where the available parking inventory shows that existing parking is at or near capacity.

Add: In and near entertainment districts, on-street residential parking restrictions should extend 5 to 6 blocks into surrounding residential areas and should last until 2:00 AM. Effective times for parking meters should also be extended well past 6:00 PM on commercial streets in these districts.

Our office has devoted numerous hours of time and effort into understanding how other cities with intensifying urban cores have dealt with their parking issues. We have discovered that those cities that were most successful in bringing life back into downtowns and promoting the use of transit, bicycles and walking were those who eliminated parking minimums in many areas. The end result was that the market dictated how much parking was actually needed, and in turn the private sector met the actual needs. Furthermore, lowered parking requirements resulted in more individuals walking the streets, which in turn, brought about safer sidewalks and increased foot traffic for businesses.

We truly believe that the way to support the citywide goals of economic development, livable neighborhoods, achieving sustainability and improving public safety is to follow the lead of communities such as Denver, Portland and Seattle.

REDUCE, never increase, parking requirements and set some spaces aside for car-share vehicles (would apply to commercial, office, and residential uses).

Commit the city to facilitate a car-sharing program.

The report says, "The typical government office project has a parking demand slightly lower than the zoning minimum (about one space per 700 to 800 square feet), while the typical private office project has a parking demand slightly higher than the zoning maximum (about 1 space per 450 to 500 square feet).

Yet, no suggestion is given that this might be because all the public sector employers provide a generous transit subsidy, and no recommendation is made to require this of private office projects.

Explore having city staff travel by bicycle and transit when possible and set targets and make commitments.

Government employees ride transit at much higher rates. Instead of saying that we must provide parking at the rates currently needed by private employees, use the needs of government employees as the baseline and work with the private sector to reduce its parking demand.

Does anyone truly believe that gas prices will be headed downward for any length of time? This study looks backward and not forward.

We were very surprised by the draft Policy Recommendations of the Central City Parking Master Plan that were presented to the Stakeholder group on August 25, 2005. Instead of considering current literature and studies that present progressive solutions to situations similar to Sacramento's, the consultants seem to have collected massive amounts of data, but then manipulated it to justify some extremely regressive parking policies.

Revise the order of the Goals as shown below and then evaluate all recommended strategies with the first three Goals as the guideline:

1. Promote alternative modes of transportation and walkable communities
2. Provide transportation options to encourage use of existing parking supply
3. Minimize the negative impacts of parking

The recommendations are not supported by the conclusions in the report. Instead, policy recommendations are inconsistent or contradictory, or obvious recommendations are not presented.

The recommendations fail to reference new reports, research and technology. Progressive thinking about parking management for the future is lacking.

The central city districts that have thrived in recent years aren't the ones that have provided the most parking; they are the ones that have provided the least. Portland, Oregon, instead of expanding its downtown parking capacity, has spent the past 30 years restricting it. There was less parking per capita in downtown Portland in the 1990s than there was in the 1970s, and Portland has one of the most successful downtowns in America.

Los Angeles and San Francisco both opened new concert halls in the 1990s. Los Angeles included a six-level garage for 2,188 cars, built at a cost of \$110 million. San Francisco, on the other hand, put in no garage — for a total cost of nothing. After each concert in L.A., the patrons head straight for their cars, leaving the area around the building deserted. After concerts in San Francisco, people spill out onto the local streets, spending money in local bars, restaurants and bookstores. Some of them have to walk several blocks to their cars parked along the curb, but every block they walk adds extra life to the neighborhood.

The Central City needs densely built projects filled with compact two and three-bedroom apartments, rather than boutique developments that make money by selling or renting luxury units at luxury prices.

I hope you will give serious consideration to the parking needs, of the many residents south of Capitol Avenue (near 17th), that have been adversely affected by the commercial growth in our area. My preference would be for an every day one hour parking limit prior to 8:00 pm and then by permit only after 8:00pm, or something similar.

In the basic plan, handicapped parking has not been included. Handicapped parking needs to be accounted for from the beginning because it takes almost double the space. Why is it not included as part of the plan? It will impact the numbers throughout. Is ADA parking being addressed throughout? The City is currently woefully out of compliance for providing handicapped parking. This needs to be a part of the initial part of the plan because it will impact counts.

There is a shortage of accessible parking. e.g. none near Starbucks at 35th and Broadway. Many parking spaces require a person to walk in street or car right of way.

Four days a week, one side of the street does not allow parking to clear leaves and debris. This eliminates 25% of the on-street parking for four hours. City Works and maintenance are often trimming trees or fixing streets on these same days, eliminating access to even more spaces. Encourage City Works and services to be done on Friday through Sunday to ease the loss of parking.

Please encourage the most efficient use of valuable central city space and eliminate unnecessary costs for residents and businesses. Use design standards, and implement policies that separate payment for parking from residential rental, and business space rental. Implement policies that encourage homeowners, business owners, property owners to rent parking space separately from other uses. Making housing and business affordable. Do not make those who do not drive subsidize drivers.

Leaving The Plan for Disabled Persons parking requirements means that there will not be adequate space and area for meeting the space requirements of Federal and State law. Please refer to the 1995 ADAAG (pre-release) and the Public Rights of Way Access Board requirements. Access should never be an add-on. Persons have been using wheelchairs for 300 years. The initial plans MUST include all members of society. Not just some persons.

As you know, I've filed a number of complaints with you [City ADA Coordinator] and the City of Sacramento regarding the City's on-street "accessible" parking and given you my opinion that presently those "accessible" on-street parking spaces within the City of Sacramento are in violation of California Government Code, Title II "programmatic" accessibility requirements and possibly other state and federal access codes/regulations. Although the City manages/creates/installs on-street parking spaces for the public to use, most if

not all of those "accessible" spaces the City of Sacramento has installed do not provide the necessary and required access for those individuals using wheelchairs and their vehicles with either a side or rear wheelchair lift or ramp. It is my opinion that most if not all existing on-street "accessible" parking spaces have a number of deviations from standard accessibility design concepts including non-complying signage (pole mounted signs at approximately 3-4 feet in height instead of at the required 80 inches in height-a blind/low visioned pedestrian could walk into one of those non-complying signs and injure themselves), non-complying passenger loading zones (those "accessible" spaces with grass within the passenger loading area are not accessible. Grass is not considered an accessible ground surface material), and in many if not all locations, if the "accessible" parking space user accesses or egresses their vehicle from the rear of their vehicle, there is no accessible path of travel (curb ramp) from the street where they deploy their lift/ramp. This condition typically requires those persons to use the vehicle way (street/road) to go around their vehicle into a traffic lane to get to the closest intersection where there is hopefully an accessible curb ramp that would provide an accessible route to the sidewalk.

Although I was pleased to hear from you and now see that the City of Sacramento will be having a public hearing to discuss the City's Central City Parking Master Plan, I am very concerned that during our latest phone conversation, you informed me that the City of Sacramento plans on creating a new on-street accessible parking policy within the next nine months. What happens to those of us who must continue to use the existing non-complying and unsafe "accessible" on-street parking spaces in the City of Sacramento for the next nine months? Are we to continue facing the kind of conditions I have described to you? The existing "accessible" parking spaces jeopardize the safety of every individual that uses a lift/ramp equipped vehicle. Waiting nine months before corrections are even thought about is not an acceptable response from the City.

I received an email from you recently that was informing the disability community about the City of Sacramento's efforts to start requiring accessible taxi cabs. Will these vehicles have back-loading ramp systems for those users in wheelchairs? If that's the case and no changes are made to the present on-street parking, you will have an additional "program" accessibility problem/violation since I don't know of many individuals, including cab drivers, that can lift a person and their electric wheelchair off the street, over the curb and onto the sidewalk (or the reverse) and I don't think that the City of Sacramento wants to have that liability! Additionally, since many of the existing parking spaces are similar to the space in the attached photos, if they are designed in a similar fashion, with no space behind the "accessible" parking space, a person using a vehicle with a back loading ramp/lift will not be able to deploy their ramp/lift because there is no room to do so.

I am once again attaching the 5 digital photos I took while in Sacramento recently. Those photos visually describe the "accessible" on-street parking space design presently used by the City of Sacramento.

Lastly, I want to inform you that I am forwarding this email message to FHWA/DOT as a formal public right-of-way complaint and asking that the City of Sacramento be investigated by that federal agency with regard to this and other related public right-of-way access violations I have raised. Included in this complaint is the City's apparent lack of a clear policy that should have been created years ago to ensure that construction in the public right-of-way includes the mandates for the required temporary accessible path-of-travel and accessible barricade system and that those systems are maintained throughout any construction project. For your information, I have attached an example of one city's (the City of San Francisco) efforts to create a policy to protect all pedestrians (including those of us with disabilities) and provide an alternate, accessible path-of-travel when they are maneuvering through a public right-of-way construction site.

This email is also being forwarded to a state-wide list of persons with disabilities who may distribute this string of emails as they wish.

Thank you.

(San Francisco's policies referenced in this email can be found at http://www.sfgov.org/site/sfmod_index.asp?id=7539)

Summary of Existing Inventory and Occupancy: This write-up should clarify that closed garages were not inventoried and that the addition of closed garages to the inventory could significantly change the picture presented by these figures.

Black Type = stakeholder comments
Red Type = community comments
Purple Type = recent stakeholder comments

Very clearly staff and consultants were under direction to craft findings from this study that creates tremendous volumes of additional parking in the central city. That is what the nuts and bolts of this report is about.

Most of these recommendations falsely and illogically assume that the central city is capable of handling unlimited volumes of traffic and parking for that traffic!!! Most of these recommendations not only reflect that concept but also replicate old, business-as-usual failed practices in other cities when and where they had no idea, but cars, as to how to handle booming business and residential. When they found those ideas didn't work, then later at great taxpayer cost they finally had to come up with other creative solutions.

We have concerns about the direction of the study, particularly the failure to use

parking policies to reduce the number of cars coming into the city. Information at a recent Sacramento transit conference clearly laid out funding opportunities for Sacramento, used elsewhere, to encourage pedestrian, bicycles and transit modes and decrease auto traffic.

Higher parking fees, especially for work trips, are used elsewhere to fund higher levels of transit service. The focus should be on alternative modes and facilitating pedestrian and bicycle facilities to increase circulation into and around the city.

We recommend that the Goals for the parking study be prioritized with the overriding goals being:

1. Policies to expand transit, bicycle and pedestrian modes in the city.
2. Utilize existing parking spaces more efficiently. Not expand parking.
3. Minimizing the negative impacts of parking on land use (poor economic use of land) and increase city livability.

Current Policy on Surface Parking Lots (SPLs):

The current City policy on Surface Parking Lots (SPL) appears flawed and runs contrary to the City's overall view on redevelopment and bringing more housing units downtown. There are numerous SPLs located throughout the downtown and midtown districts. They are typically owned by individuals and operated by a limited number of parking operators. There is also a recent shift toward these lots being purchased directly by parking lot operators whose sole purpose it appears is to extend the use of these lots as parking income generators. Many of these lots are located in prime corner locations within the City that would be more suitable to development. There are also examples of SPLs in vital locations that are simply lying idle with neither development nor parking nor any physical upgrades per City Standards. The policy is intended to limit the use of these SPLs to terms of 5 year increments. There is a general sense that these 5 year terms are easily rolled over to continue the use of the SPLs as simple parking lot income generators. There does not seem to be proper diligent enforcement of the conditions in which these lots are supposed to be operated. In this current environment, the cost of parking is rising dramatically for downtown residents, businesses and restaurant patrons. In addition, prime real estate is being used for low density surface parking instead of more meaningful high density parking facilities, mixed use redevelopments that include parking and housing or parking structures that can better serve the community. We are suggesting a new City Policy be crafted and approved by the Council to correct a policy that is simply not working.

City as Lead Sponsor For Alternative Parking Facilities:

The City is currently undertaking a citywide parking study. This is a good and logical first step. It is our hope that the City then takes leadership both in policy, implementation and financing to solve our parking problems that will only get worse as our city grows. We cannot rely on the private sector to finance

alternative parking facilities such as structured parking. The solution, as is the case in most other cities, must be spearheaded by the City for this to work.

It is our impression that a new view to parking structures is forming. Perhaps massive City parking structures in only a few select areas is not the answer and that a prototype smaller split level facility scattered in numerous key areas as defined by the upcoming Parking Study makes more sense. The Prototype should be located in key districts yet positioned in the interior of a block along the alley for example. By positioning them as such, that leaves the valuable corners and frontage property ripe for higher use development such as retail, restaurant and housing. This approach kills two birds with one stone. Parking demand is met more efficiently in more districts and the City is not faced with underutilized, partially vacant massive structures that don't cash flow.

New Policy for SPLs:

One suggestion is to define SPL into three categories and craft policy accordingly. This categorization should be based on the Parking Study underway that should define where the key areas of need exist. Different policy criteria should be implemented based upon the different types of sites.

- a. Corner SPL – if the SPL is located at an intersection corner (ie. NEC of 16th and J), a short term use permit should be issued that is subject to annual review.
- b. Midblock SPL – if the SPL is located mid-block, then this use permit should be subject to review every three years.
- c. Interior SPL – if the SPL is located in the interior of a block along an alley, this use permit should be subject to 5 year review if not longer. This is the ideal location for parking and should be allotted the most leniency on Term and capital improvements since the lot is least visible to the public eye.
- d. Residential SPL: if the SPL's primary function is to provide monthly parking for downtown **residents** and this allows the owner/ developer to meet its parking obligations to the City, this use permit is subject to 10 year review.
- e. Critical site SPL – if the SPL is located at a strategic location deemed vital for redevelopment or structured parking (ie. SEC 16th and J), condemnation must be considered by City followed by a city sponsored parking structure or RFP to the development community for mixed use development including surplus parking for the public.
- f. Toxic site – if the SPL is located on a property that has severe toxic contamination and all proper studies have been made to verify clean up costs as prohibitive, then this use permit should be subject to review every 5 years with an understanding that the term will be indefinite up until the time in which toxic cleanup is feasible. It will be the responsibility of the property owner to evaluate the clean up costs every 5 years as a condition of continued SPL use. As a general rule of thumb, "severe toxics" are defined whereby the cost of remediation exceeds the fair market value of the property. Only in this situation would the Use Permit continue on. The SPL owner must make his case based upon updated Phase II reports to the City's Chief Parking

Official and Chief Planning Official to extend such use. The City has the ultimate discretion to discontinue or extend the SPL use permit.

NOTE in addition to conditions on Term, we propose that there exist a sliding schedule of "SPL Fees" that increase the longer the lot is in use as an SPL. Meaning there exists a built-in disincentive to continue to use the lot as an SPL. The concept of this makes sense to us but we don't yet have a sliding fee schedule to suggest. Perhaps the City Chief Parking Official can run with this concept and form a policy here.

It is critical in any extension of use rights that a certain portion of the parking spaces be allocated for monthly residential parking in that district. I would propose that 25% of all spaces must be first made available to RESIDENTS on a monthly basis prior to those spaces being used for hourly or valet use. The City Parking Study can better determine what % makes most sense based upon the various forms of parking demand (office, residential, restaurant etc) in each defined parking district. In addition, we propose some rent control provisions on what these Residential Parking Spaces (RPS) can be rented for on a monthly basis. This is almost akin to limiting what "affordable housing units" can be rented for on housing projects. It is based upon a defined formula (ie for housing it is 80% of median income etc.) We propose that the rent for these "RPS" be capped at the average of comparable spaces within a 5 block radius of the proposed site. (perhaps again promote housing development, the rent is capped at 90% of average rents in the 5 block radius) On an annual basis, the City Parking Division updates a data base of all city parking rates and the rate for RPS shall be defined in this manner. This "residential set-aside" is critical to this new SPL policy.

SPL Improvement Obligations:

There should be a staggered structure to the obligations on improving the SPLs. It should be based upon allowed Term. For example, the "Corner SPL" that are subject to short term use, the improvements must be minimal (modest landscape on frontage and adequate lighting etc.) As the Term of use is extended based upon the different classifications, the improvement obligation can fairly become more substantial. For example, a "Toxic site" should have an obligation for full upgrade per City code including possibly some public art or enhanced landscaping etc. What is presently happening at the SEC or 16th and J is an example of what CANNOT be allowed to continue. No development, No parking and No beautification! This is an example of a current failed policy that falls under category "d." above.

SPL Term Extension and Policy Enforcement:

Once the Term has expired, the SPL owner can petition the City for an extended term. The acceptance of this extension is subject to the City Parking and Staff sole approval.

Current owners of SPL's have the following options once their Use Term expires and extension is not granted by the City:

- a. Sell the property subject to this City SPL Policy
- b. Develop the property into mixed use project with surplus public parking either themselves or JV with developer.

The City must be prepared in those rare circumstances to enforce Condemnation rights where applicable.