## WORKING PAPER

## LOCAL JURISDICTION PARKING REQUIREMENTS: A SURVEY OF POLICIES AND ATTITUDES

### AB 2766 PARKING MANAGEMENT PROGRAM

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What is the status of local parking policy? What do local planners think about the key issues in parking policy? Unfortunately, debates about parking pricing and supply have occurred without much input from the people who deal with this issue on a day-to-day basis. This paper reports on a local government parking policy survey that addresses these questions. It is part of a larger project of outreach and consensus-building called the AB 2766 Parking Management/Local Government Project. Under the direction of the Mobile Source Air Pollution Reduction Review Committee (MSRC), the project team is helping communities develop win-win coalitions to reform parking requirements, in support of regional air pollution and mobility plans, and in implementation of AB 2109. AB 2109 is the state law that mandates the cashing out of certain employer-provided parking subsidies when they take the form of cash outlays, and requires local governments to consider parking requirement reductions for developers intending to cash-out parking.

The purpose of the survey is to provide information about local jurisdictions' parking policies, focusing on the attitudes, motivations and circumstances. Parking is an important aspect of air quality policy because a substantial body of evidence shows that parking charges effectively reduce solo driving, and hence vehicle miles traveled and air pollution. However, parking utilization studies show that workplace parking is often oversupplied, making market parking prices unlikely. (References on these issues are listed at the end of this paper.)

Opportunities to reform workplace parking policies have been brought about by the passage of AB 2109, by recognition of mismatches between parking demand and minimum requirements, by the use of shared parking, and by transit development and ridesharing. For new development, some jurisdictions may lower minimum requirements in response to these factors. For existing development, opportunities exist to re-use underutilized portions of parking facilities. This project is intended to support local efforts to reform parking policy in a way that can meet the objectives of the major stakeholders. It involves outreach to key stakeholders, through workshops, interviews, presentations, and consensus-building activities. This survey is a key first step.

All local and county jurisdictions in Southern California were contacted and asked to participate in the telephone survey that was undertaken in the fall of 1995. The survey asked twenty-five questions about parking policy, development practices and attitudes. The survey achieved high

participation-144 of 159 jurisdictions responded.<sup>1</sup> Survey questions focused on workplace parking (e.g., office, manufacturing, warehouse, and medical buildings). An inventory of parking requirements was obtained from existing sources, and so was not part of the survey.

The survey was targeted to planning directors and senior planning managers who are familiar with planning and parking issues. The primary respondents were planning directors/community development directors (20 percent), senior planners/planning managers (30 percent), associate/assistant planners (32 percent) and others (17 percent). In some cases multiple individuals were surveyed because of the division of responsibilities in the jurisdictions.

This paper organizes the survey results around nine key questions:

## What are the workplace parking issues in local jurisdictions?

The most common response to a question about workplace parking issues was that there were *no* important issues, indicating a general satisfaction with workplace parking. Figure 1 shows the distribution of the responses, indicating that parking *undersupply* is the next most frequent answer. This is somewhat unexpected, since other research shows that parking is often oversupplied, but for these communities at least some land uses or areas are perceived as having insufficient parking. In reviewing comments provided by respondents, it appears that these undersupply issues are focused in three circumstances: 1) older areas, such as downtowns or areas with legal non-conforming uses; 2) areas where shifts in use or intensity of use have occurred; and 3) areas where uses compete for



parking (e.g., beach parking versus retail parking). Note that most of these concerns do not pertain to parking standards for new uses, but past development patterns and/or parking management.

The problem of accurately assessing the appropriate level of parking to require was second most the important issue. In addition, concerns with excess parking demand spilling onto local streets, adjacent properties, neighor were common. borhoods The intensifying land use category pertains to situations in which the intensity of use in a building, through changes in use or employee density, results in an increased demand for parking. The "other" category includes a wide variety of responses,

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<sup>&</sup>lt;sup>1</sup> The average size of the cities surveyed is 85,255. City density averages 5,820 persons per square mile. The average size is 59,458 if the City of Los Angeles is excluded. The average size of the counties surveyed is 3,724,425.

such as parking space size, circulation, safety, convenience, cost, access/egress, handicap parking and parking oversupply. Parking oversupply was identified as an issue by only three respondents, indicating that most planners do not perceive this as an important issue.

The apparent satisfaction with workplace parking shown in Figure 1 is further indicated in responses to a question about whether current minimum requirements result in an appropriate level of parking. Most respondents thought they did. Using an answer scale that ranged in five steps from "almost always" to "never", 44 percent of respondents indicated that current requirements "almost always" resulted in an appropriate level of parking, and 46 percent said that they did so "most of the time".

A very small percentage of respondents were dissatisfied with their current requirements. Of course, responses to these questions were based on the respondent's judgment of "appropriate", which may vary from how others would perceive it. Nonetheless, this helps explain why workplace parking requirements are often not high on the local policy agenda.

## Why do jurisdictions have minimum parking requirements?

Figure 2 summarizes the main rationale for minimum parking requirements. The primary response given was the rather circular reason "to have an adequate number of spaces" (54 percent of respondents). The other responses indicate *why* an adequate number of spaces is desired. The



responses confirm planners' concerns with avoiding parking spillover onto adjacent streets, maintaining traffic circulation, and avoiding parking spillover onto adjacent properties. Those who responded "adequate number of spaces" were further queried as to the public objectives that are fulfilled by adequate parking. Those responses followed the same pattern as in Figure 2, indicating the importance of spillover issues and traffic circulation. The only difference in the order of responses was that the economic success of the project was more frequently indicated as a justification (14 percent of those responses).

The survey responses dealing with avoiding parking spillover onto adjacent streets, maintaining traffic circulation, and avoiding parking

spillover onto adjacent properties suggest that on-street and adjacent property parking are not regulated or priced in a way that can prevent these problems, or that enforcement of regulations or

pricing is inadequate. This is a key group of issues that, if not resolved through innovative programs, will impede parking reform.<sup>2</sup>

The "other" category answer includes factors such as ensuring the economic success of the project, consistency with regional and national standards, land use planning issues, safety, convenience, and aesthetics.

The survey asked whether the jurisdictions had parking maximums or subarea caps, techniques that have become popular ways to address congestion, land use, and environmental issues in some jurisdictions. The respondents overwhelming indicated that their ordinances did not have these provisions (98.5 percent responded no). The lack of caps means that there are no limitations to the amount of parking a developer can provide, regardless of trip-inducing potentials of the additional parking. The three jurisdictions that had parking maximums applied those policies in downtown areas where congestion is severe and land availability is limited.

## What are typical minimum parking requirements?

Parking requirement data drawn from *California Parking Standards* (Walker Parking Consultants, 1995) was used to calculate the average parking requirement for responding jurisdictions. The Walker study is not a complete sample; data for slightly more than half of the respondents was

available. Table 1 shows the average parking requirement for the jurisdictions covered. The lowest and highest requirements are also listed, indicating a wide range of requirements.

Table 1: Parking Requirements (spaces/1,000 SF)

	Average	Lowest	Highest	n
Office	3.5	1.0	6.7	74
Manufacturing	1.8	0.6	4.0	72
Warehouse	0.8	0.2	4.0	70
Medical Buildings	4.7	2.2	7.3	71

Source: California Parking Standards, Walker Parking Consultants, June 1995.

# Do minimum parking requirements affect project density?

One significant impact of parking requirements is that they can limit density, and therefore act as an indirect form of growth control. Respondents were asked if minimum parking requirements have the effect of limiting density (as opposed to floor area ratio (FAR), building coverage, or setback regulations). The majority of the respondents said yes–57 percent of respondents said "most of the time" or "almost always". Therefore, parking requirements, purposefully or coincidentally, are fulfilling two functions: requiring the provision of parking and limiting density. If FAR regulations and the density-limiting effects of parking requirements allow the same amount of development, then this is not a problem. But often, parking requirements limit density to less than the permitted FAR, and therefore represent a "hidden" FAR policy. Not explored in the survey is how much of the support for current minimum parking requirements is based on the density-limiting effects, as

<sup>&</sup>lt;sup>2</sup> Example programs to address spillover include parking permit programs, parking meters that return revenues for local community improvements, access and/or pricing controls of off-street parking, and enforcement of parking regulations.

opposed to the parking effects. Only one quarter of the respondents said parking requirements "seldom" or "never" influenced density.

How frequently do developers request modifications from standard requirements?



Respondents were asked a series of questions about how often developers sought to provide an amount of parking different from the standard parking require-The survey asked ment. about four instances: 1) supplying more than code requirements, 2) seeking reductions based on shared 3) seeking parking; redshared uctions without parking; and 4) fulfilling code requirements with offsite covenants.

Most respondents said that their jurisdictions deal with four the categories of changes in at least some instances-a small group (between 3 and 14 percent, depending on the type of change) said they never deal with changes. Figure 3 tallies respondents who deal

with changes half the time or more. The most frequent modification is using off-site covenants, followed by reductions based on shared parking.

Parking reductions and offsite provision usually require approval from the local jurisdiction. Table 2 tallies the most frequent responses to a question about how planners handle these requests. The tally shows that variances are the most commonly used tool.

#### Table 2: Mechanisms for Adjusting Parking

Reductions based on shared parking	Reductions without shared parking	Off-site parking
Variance w/ study (30)	Variance w/ study (69)	Ordinance w/ study (12)
Ordinance w/ study (18)	Ordinance w/ study (4)	Variance w/ study (12)
Agreement (13)	Conditional use permit (3)	Conditional use permit (3)
Conditional use permit (8)		
Ordinance by right (4)		

Note: the number following each category indicates the number of respondents.

The responses concerning off-site parking indicated that there was frequently a specified distance within which off-site parking is allowed (between 150 and 750 feet; 300-500 feet was the most common range).

## What is the status of parking policies?

Slightly more than half the respondents had revised some aspect of their workplace parking requirements in the last five years (52 percent, n = 133). This is a sizable proportion, but the changes were not necessarily comprehensive revisions. For example, changes to the parking requirements of a single land use would constitute a change. In a separate question a smaller, but significant, proportion of respondents (37 percent) had required, commissioned, or conducted parking demand or utilization studies in the last five years.

The survey asked for the date of the latest circulation element to get a sense of the frequency with which general plan policy, and more specifically, transportation policy is addressed. Slightly more than half of the respondents' jurisdictions have circulation elements dating 1991 or newer (52 percent, n = 133). One quarter of the elements were dated 1985 or before, and therefore are not likely to reflect recent initiatives in transit, ridesharing and parking policy.

## How do jurisdictions establish parking requirements?

Most respondents described a process in which the planning department serves as the lead agency for establishing parking standards. Most indicated that such studies would be conducted in-house. A typical process involves planning department studies, consultative processes or task forces, with recommendations for ordinance revisions reviewed and approved by the planning commission and city council. Public works, engineering, and police departments were the most frequently mentioned collaborating departments.

Planning directors were asked about the information sources they use in estimating parking demand (see Figure 4). The common practice is to collect information on neighboring cities' parking requirements. This strategy is popular because it is inexpensive and in part because cities are competing for development, and avoid veering far from norms. However, this can be a faulty strategy if neighboring requirements are not appropriate.

Most respondents indicated that they would use at least two sources of information in estimating requirements, so it is typical that other cities' requirements would be compared with other sources. Institute of Transportation Engineers (ITE), American Planning Association (APA), and Urban Land Institute (ULI) publications were the commonly cited sources. Unfortunately, these sources usually provide national averages, which may not be applicable to local conditions.



"Commission parking studies" was only about five percent of the response, suggesting that data on local parking demand is rarely available. However, as discussed previously, 37 percent of respondents had required, commissioned or conducted parking demand or utilization studies in the last five years. This suggests that such studies are done for special purposes or perhaps for specific development projects.

The survey also asked planners a series of questions about parking demand trends. It is likely that parking requirements will require more frequent revisions in the future, as the nature of work and commuting changes. Trends such as contracting work, telecommuting, office hoteling, and economic specialization mean that parking requirements will have to be more carefully tailored to future workplaces. Planning directors were asked to identify factors that will have an influence on parking demand over the next decade. Figure 5 shows that the primary responses are transportation related-transit development, ridesharing, and telecommuting-factors that would tend to *reduce* parking demand. Although transit development has not yet had a major impact on commute mode choice, the region has experienced increases in ridesharing and telecommuting.

The "SCAQMD regulation" category refers primarily to Rule 1501, the employer rideshare program mandate, which has since been replaced. The remainder of factors concern changes that would affect the density with which land or buildings are used, that could raise *or* lower parking demand depending on the direction of the trend. The actual changes depend on how workplaces are restructured in response to changes in technology. For example, the trend to temporary or shared offices might increase employee density in some worksites, while reducing it in others.

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## What are planners' attitudes about parking policy issues?

The attitudes of planners have a bearing on how parking issues are studied, presented, and adopted as policy. The survey included six provocative questions, to which respondents indicated strong agreement, agreement, neutrality, disagreement, or strong disagreement. Figure 6 shows an agreement score calculated for each question. Positive numbers indicate agreement; negative numbers indicate disagreement.

The figure shows paraphrased versions of the questions. For clarity, the full questions are as follows:

- 1) Parking charges reduce the level of solo driving and parking at a workplace.
- 2) Developers should be allowed to fulfill some of their parking requirement by using underutilized parking in developments that are close by.
- 3) Free parking at workplaces is a right of employment.
- 4) On-street parking should be priced to manage its use.
- 5) Current parking policies require developers to oversupply parking.
- 6) Developers should determine the amount of parking to be provided in projects.

The responses ranged from significant agreement to strong disagreement. There was agreement that parking charges reduce parking demand, yet many saw free parking as a right of employment. As long as this attitudes prevails, planners will not likely support parking pricing or reductions of minimum parking requirements, even as they acknowledge the potential effectiveness of these policies in reducing demand. There was significant agreement that developers should be allowed



to use adjacent underutilized parking, and moderate agreement that on-street parking should be priced.

Planners generally disagree with the statement that current policies require an oversupply of parking. This reinforces the survey responses concerning workplace parking, which mentioned parking undersupply as a problem. Future studies could focus more specifically on what types of workplaces lack parking, because other research shows that office building are generally oversupplied with parking.

The strongest disagreement concerned the statement that developers should be allowed to determine how much parking to provide. Apparently planners don't trust developers to provide the correct amount of parking, even though developers would bear the most direct economic consequences of creating a building that does not meet market demands for parking. It is likely that this response is based on an assumption that spillover parking would create a public problem, not just a private one. Planners are also concerned with potential changes in use or density that may occur after a project is completed.

## What do the survey findings mean?

The survey findings reported here present a paradox. The policy direction of regional, state, and federal governments favors parking reform, supported by research on the effects of parking pricing and alternative supply policies. On the other hand, many local jurisdictions are quite satisfied with

their current parking requirements, and some disagree with the premises of recent policy initiatives. They generally perceive parking to be appropriately supplied, while research findings suggest that workplace parking is oversupplied.

Policy makers at the regional, state and federal level are concerned about the connections between four interconnected policy areas: parking, transportation, environmental quality, and urban form. Their parking reform initiatives consider parking in the context of those issues. Local jurisdictions, on the other hand, address parking issues from the standpoint of impact mitigation, traffic circulation, community disruption, and economic development. The survey results also suggest that parking requirements' density-limiting effects may be a non-transportation rationale that constitutes part of the support for current requirements. These differences in perspective help explain the paradox mentioned previously–they stem from differences in the underlying agenda of each interest group. To move forward on a consensus basis, a better understanding of both perspectives is needed, so that strategies will be acceptable to the broad range of actors involved in parking.

The larger purpose of this project is to expand the dialogue on these issues at the local level, with actors who affect parking policy-jurisdictions, developers, TMAs, employers, lenders, and others. This dialogue will explore the thinking behind some of the responses reported here and reveal the perspectives of other actors involved in development process. It will lead to concrete discussions on how parking policy can be reformed to address local concerns while supporting regional initiatives in air pollution reduction and travel demand management. We welcome your comments and questions.

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