B-TOP's
Response to the
Downtown Parking Master Plan
Draft Report

3/22/2007

The following response begins with some general statements about the study, then it provides detailed responses to each section with suggested text changes, etc. It ends with an op-ed written by Buff Brown of B-TOP that was published March 3 in the Herald-Times. In general, this response focuses on the things we prefer to have changed, so it focuses on the negatives rather than the positives. Ultimately, we agree with many of the major conclusions of the study, and try to point that out along the way.

The Goal

Certainly, the long-term goal of this study is to determine the best way for our city government, with its limited resources, to create a vibrant downtown. Currently, the city is trying to determine parking policies and plans that might do that. Here are some general insights.

For a downtown to be vibrant it needs people. People do not live or work in parking spaces, nor do they come to visit parking spaces or parking garages. Parking spaces are not destinations. They take up valuable downtown space that could otherwise be destinations or living/working spaces for people. It is important to consider that for every provided parking space there is an opportunity cost. The 'vibrant downtown' goal is to have people and entice people downtown. Evidence indicates the most successful way is to have people living and working downtown and to have people visiting -- without their cars -- to maximize living and working space, and to maximize destinations.

Dr. Norman Garrick, Engineering professor at University of Connecticut, in his study and article titled *Parking at Mixed-Use Centers of Small Cities*, documents the dangers of excess and under-priced parking. He concludes,

> "Communities often overlook the possibility that a parking surplus may have undesirable consequences. Land unnecessarily consumed by parking is an opportunity lost for a more beneficial use, and uncalled-for parking also extends distances between points of interest, diminishing the ability of a town center to be pedestrian friendly."

General Comments

In general, this draft report fails to describe the dangers of excess parking; it fails to emphasize the relationship between parking supply, demand, and price on mode choice, and it fails to describe the negative externalities that come from high SOV (Single Occupancy Vehicle) use. These are not only environmental, but also economic.

Many cities and universities are realizing the failure of years of parking policies that have encouraged urban sprawl and car dependence. Cities are turning parking policies on their head and limiting parking construction in their downtowns by implementing parking maximums rather than minimums. Alan Ehrenhalt, a well-known columnist for Governing Magazine writes,

> "Ironically, 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."

Dr. Donald Shoup has analyzed parking policies more than anyone, and has written the "Bible" on it (*The High Cost of Free Parking, 2005*). He blames many of our urban ills on parking supply-side policies, and specifically on parking minimums. Unfortunately, this parking study does not address Dr. Shoup's research and policies in enough detail to provide the public or the decision makers of Bloomington with the tools he has provided. Nor does this report explain the negative impacts of past and continued supply-side parking policy, which include impacts on transit use, bicycle use, and walkability; water and air pollution; CO2 emissions; asthma, obesity, and public health; mobility of the poor and elderly; social equity; sprawl; energy consumption; and the local economy, to name a few. To a large degree, with some pleasant exceptions, the report still preaches supply-side parking policies.

Also, the relationship between mode choice and parking availability is not developed thoroughly in the report. Throughout this report, the term "need" is used in reference to parking. Transportation and people are needed to meet the goals of making downtown more vibrant, but cars and parking spaces are just one means of many to bring people downtown. This "need" arises out of a concept that with current supply and trends, an under-supply will eventually occur. However, increasing the supply is only one option; a second is lowering the demand by raising the price. Also, good transit, pedestrian, and bike options and appropriate downtown housing can also evaporate the "need". Additional parking is not a "need", but just one option. Thus, the term should be changed to something more objective.

We also believe very strongly that the growth rates of 3%, 5% and 7% are excessive, unsubstantiated, and undesirable when predicting future car populations in downtown. These general comments are reflected in the op-ed at the end of this document.

Important things missing from this study:

- There is very little explanation and virtually no apparent analysis regarding reserved versus permit spaces. This is a paramount change that will make an enormous amount of parking available to employees and residents. Although we are very happy to see it in the recommendations, there is very little description of the virtues and the methods necessary to make it work and the analysis of spaces that will then be available.

- A crucial element missing from this report is an analysis of the results of implementing the recommendations. There appears to be sufficient data available that immediate and projected on-street and off-street adequacy could be predicted upon implementation of the recommendations. The parking department has data on the number of people on current waiting lists who would buy garage permits if they could. There are data from license plate studies that could predict the number of employees who are parking on-street and moving their cars every two hours. Predictions should be made regarding the impact on available on-street parking, as well as the amount of on-street parkers diverted to garages or transit. This would likely have a significant effect on the current parking inadequacy projections and would more clearly show the benefits of the recommendations.

At the least, if a quantitative analysis can not be accomplished, a qualitative discussion of the expected results would be valuable.

- The report lacks details of on-street parking meter options. Since one of the major suggestions is metering the parking, this should be thoroughly analyzed. There are many options for the various types of spaces, they should all be described and explored as to their applicability throughout downtown.

The document is called a "Parking Master Plan". This name is worrisome. It indicates that this is a long-term parking plan that might go along with Bloomington's "Long Range Transportation Plan" and other long-term planning documents. However, as noted before, because it does not look holistically at the way parking supply affects so many other aspects of Bloomington's growth —such as land use, transportation, and sustainability--- B-TOP does not believe this should be adopted as the city's "Parking Master Plan."

Details

This section goes through the report page by page.

The following statement can be found on page 7 of the report:

> *"The inventory is compared to the parking demand to quantify the existence of a parking surplus or deficit. A surplus exists when the supply exceeds the demand; a deficit exists when the supply is inadequate to meet the demand. We conducted this analysis on a block-by-block basis within the study area, segmenting the demand by block."* **p 7.**

Pricing regulates demand. The above statement simplifies the issue by leaving pricing out of the equation. The report needs to emphasize the effect of price on demand.

Task 4 – Alternatives Analysis – This section does not include the alternative of setting parking policy, supply, and price such that:

- the goals of the Growth Policies Plan are met.
- the use of other modes of transportation are enhanced and maximized
- the downtown viability, space, and livability (quality of life) is maximized

These may not include the construction of additional parking garages, which seems to be the objective of this section.

Task 5 - The study could look at the costs of providing parking relative to providing transit with regard to governmental expenses, the opportunity costs of using downtown space for parking purposes, and costs to the individual who uses the different modes of transportation. In addition, the report might consider - what is the revenue generated to downtown businesses by each type of use: parking, living, office and retail space?

It appears that the public parking garage spaces that have long-term leases with particular landlords or businesses are listed in the "private" category rather than the "public" category. These spots are part of the public's inventory of parking and these leases can be changed to be available to the public. This has a significant effect on the rest of the report, since the report maintains these categories throughout. It gives the erroneous impression that there is very little off-street parking available to the public.

The license plate information could be used to help determine how many employees are moving their cars around. It is unclear whether this parking time includes some of the cars that move around the downtown to avoid a fine. If so, does it treat these visits as single, continuous visits or as separate visits?

p. 14 "*Most of the demand during the weekday daytime is generated from the high concentration of office and retail uses, as well as university students in the study area.*"

What does "university students" refer to? Are they customers or are they residents? This study does not show how to distinguish them.

Table 8 . The draft report states a 98% (140 cars in 143 spaces) occupancy at 7:00am and 57% 3 hours later. This indicates 58 cars left in that time. I believe this 98% is inaccurate. We never saw more than 114 spaces occupied when inspecting 7 days in a row at 5:00am (and it was less the other times of the day). There were 13 spaces that were <u>never</u> occupied the entire week. Considering the rate they must have exited and the percentages of the other times all the way till 10:00pm (50%), this datum is highly suspect; it is likely a typo – maybe '104'.

The draft includes an IU parking garage in the public parking supply. This turns out to be the major parking inadequacy in the area. This causes problems in Tables 17, 18 and 19. The fact that the report does not distinguish IU parking lots from city lots causes some confusion. IU lots should not be included in this study, although it gives the city a chance to suggest that IU raise its prices. IU has the second lowest parking prices of Big 10 Schools, second only to Purdue, and they are almost ½ the price of the 3rd lowest.

p. 14 –Table 5 shows 5163 occupancy, but the text says 5152.

<u>Figure 2, 3.</u> These figures should also include colors of areas with surplus parking. It should show the surpluses in incrementally brighter greens, for example, similar to the reds used for the inadequate areas. It is important to see those blocks with an over supply juxtaposed to those with an in-adequacy.

There is data table for Figure 2, but there is no table that contains the data illustrated in Figure 3. The weekend map is very confusing. It seems that the data represents the 1:00pm peak survey. Is that correct? This also needs color coded blocks showing surplus parking. This is the time when the bank parking lots become available in blocks 39 and 40 and have significant parking to meet the demand in inadequate blocks. Plus, the 4th street parking garage is virtually empty along with the IU garages and surface lots. However, since the data are not provided, it cannot be easily determined.

It is apparent that the capacity of many of the on-street places has been miscalculated. There are blocks that are commonly more than 100% occupied, and block 11 had 439% occupancy at midnight on Saturday; 79 cars with a capacity of 18. This is going to sway the data to toward inadequacy, when in fact, it is an enforcement issue.

It's important to note that the on-street parking inadequacies pointed out will be very different once the recommendation of metered on-street parking is implemented. As previously noted, the report needs to indicate what the predictions would be if the recommendation was implemented.

The data also shows the general inefficiency of private parking. It is imperative that this general truth be brought to the attention of policy makers in this report because it means that a parking requirement that creates private parking spaces will be used less efficiently than public spaces. This should discourage the existence of parking minimums and encourage the creation of parking maximums, public control of spaces and shared parking.

p. 25. The prediction that there will be a shortage of public spaces at 3% in 5 years is quite incredible; it is literally not a credible prediction. It is based on an under statement of public off-street spaces that do not include public spaces currently leased to private people in the garages. Many of these spaces are empty and will become available upon a change in parking garage management policy from reserved to permit spaces. It is also based on never charging for on-street parking.

License Plate on-street study
This study is too macro for a good evaluation. The draft report does not show results on a block-by-block basis. The final comments do not distinguish what kind of off-street parking is available, IU or private business. As noted before, it is unclear whether a car that moved to a different block is considered a continuous length of stay. It appears this data could be used to determine how many employees are parking on-street and moving their cars.

p. 30. Recommendations - No one can build a parking structure for $12,000/space anymore. They are $20,000-$30,000 and up.

"*fill in the missing teeth with buildings*" – Great idea!! Also, consider stating the locations being referred to when discussing locating off-street parking *"off the main corridor streets*". Does this refer to particular businesses that have off-street parking and drive thru services on the city's most vital and viable pedestrian street?

"Future parking demand projections in the study area indicate that parking will likely be inadequate on at least eighteen blocks during peak periods. The following section of the report provides recommendations to improve the existing parking supply's adequacy and perceived adequacy." This general statement needs to be qualified. When is this true? The correct statement should be that the "demand will meet the supply at current

prices". Again we say the term "adequacy" connotes the only solution is to increase the supply.

"Parking rates are directly affected by supply/demand. In order to continue the low rate trend, parking should be studied as each new development is proposed." Please admit here that a low rate encourages driving and discourages other modes of transportation. Why is it suggested to leave the prices low? Why not say that prices need to be adjusted to regulate demand to keep it slightly below the supply?

Here is a suggested statement:
"Parking rates directly affect the demand. The rates are currently low. If it is in the interest of the city to keep rates low, more supply will need to be considered. If it is in the interest of the city to not grow the car population in the downtown and/or to encourage other modes of travel and maintain development space for better uses, then parking rate increases should be considered."

The only "*imperative"* is that, once this threshold is reached, one of these actions is taken.

"As the city grows and parking demand increases, it is important to plan the parking to grow with the expansion, in order to continue to meet the growing parking demands, if warranted. It appears that the existing parking supply will satisfy demand, as projected. Increases in demand may cause some blocks to experience shortages, but those shortage may be overcome with a combination of shuttles, pricing strategies, etc. However, if unexpected major development occurs, the parking supply in the area of the development may need to be re-evaluated."

This is the best paragraph in the report. This should be one of the main points, if not the main point of the conclusions/recommendations.

Clarification on *Shuttle*: Experience indicates that shuttles in relatively small downtowns generally cause driving to the detriment of using transit from home and growing transit services, so B-TOP stays lukewarm on this suggestion.

p. 34-36 – These on-street parking policy & practice statements are great and right on. Some important statements have been left out in the discussion of on-street parking metering; that it creates a higher turnover and thus more visitor/customers actually will visit the stores. Also, that it eliminates the perception of scarce parking, which is a reason many currently do not shop downtown. Research by Dr. Shoup shows metered on-street parking -- where previously free and at capacity -- results in more customers!! Again, a thorough discussion of metering options is needed here. Also, the report could recommend exactly what blocks of on-street parking should be metered for maximum benefit.

p. 38. Residential parking programs. – This needs to mention the possibility of Neighborhood Parking Benefit Districts as described by Donald Shoup.

p. 44. Indiana has a BMV: Bureau of Motor Vehicles....not the DMV.

p. 45, 49 CMAQ is not available for use in Bloomington. It is only allowed to be used in nonattainment air quality areas. Since Bloomington does not have an air quality monitor, it is in compliance with the Clean Air Act.

TDM – TDM is paramount to the Growth Policies Plan objectives. This is a good discussion of it, although it is limited. These ideas/programs need to be included firmly in the recommendations, but they are not.

p. 48. *"Presently in the Downtown Bloomington area there is little incentive to choose any other option besides driving alone. In order to successfully implement the discussed TDM strategies, viable alternatives to driving must exist. Therefore, changes to the current transit system may be needed. When transit is sufficient, it can be part of a successful strategy. The formation of a Transportation Management Association would also help to facilitate the implementation and marketing of various TDM strategies."*

B-TOP members take some offense to this comment. Bloomington Transit provides good service. It is true that transit could use later hours and more express routes, but it continues to be undermined by car-preferring planners, and it is not considered by planners for improvement (e.g. BRT, dedicated bus lanes) when studying ways to bring mainstream people into the downtown. Also, transit needs marketing, and it is not marketed by our city government. The result of years of car-only planning is cars-only. Carpooling is another possibility that requires some governmental effort and marketing incentives, which has not been done.

p. 56. graduated parking fines – good idea.

p. 57. We suggest the following *mission statement*:

"Our mission is to contribute to the quality of life, and growth policies of Bloomington by providing effective parking management strategies and efficient, safe and courteous parking services to the citizens and visitors to the City."

What needs to be affordable is a way to travel to downtown; affordable driving is not the imperative, affordable travel is. Also, parking policy in the downtown has a much broader effect than just on the downtown, so the mission should not be limited to a successful downtown.

p. 57. Bullet #2 under objectives should be removed, or replaced with a statement that declares that parking supply and pricing are the primary contributors to mode choice, and that parking strategies must be tailored to meet community goals. At the least, take the word "affordable" out of the bullet statement.

p. 57. The following should be on the list:

- creation of a Transportation Management Association (TMA).
- creation and implementation of a TDM program.

Rather than suggesting the ***Marketing of Parking,*** suggest the marketing of a TDM program such as at the University of Wisconsin or the City of Missoula with its "Missoula in Motion" campaign. These programs focus on marketing other modes of transportation other than driving. As a result, the programs relieve parking demand.

Marketing Initiative Examples – many of these programs have the effect of switching the cost away from the user. The result is that it creates an incentive to drive and it increases the number of parking spaces demanded. The programs where a business pays downtown parking fees of customers creates a tragedy-of-the-commons issue, where the incentive to drive and parking on-street takes away parking otherwise available for patrons of other businesses. Other businesses will do the same until parking is basically free again and the problem returns to what it was. Ultimately, everybody loses. This should be included in the discussion.

p. 66. To tie parking-rate increases only to standard cost of living increases is completely inconsistent with the previous recommendation of determining pricing/rates by supply and demand. Listing prices from comparable cities that have mode splits Bloomington would like to achieve would be helpful. Included should be a discussion on the consequences of low rates with regard to encouraging driving, requiring more parking , encouraging less transit use, etc.

Financial Analysis – This analysis is very tenuous. The fact that it only looks at operating costs and does not include construction and land costs leaves out a very important cost to the public. Likewise, the expected usage contemplated is 75% to 90% while the evidence in the survey is completely counter to a prediction that such a demand would exist for a new garage of 400 spaces. This analysis is merely instructive to general parking garage operational costs, but not at all instructive to Bloomington's downtown parking situation. The analysis appears to have reserved spaces (150 of 400), when the report recommends against having any reserved. This is inconsistent. The values in the table and the explanation of the analysis are not sufficient to determine how the values were arrived at.

This section should be couched with the corollary that indicates the inappropriateness of this to Bloomington, considering that with the current oversupply of parking and the expected implementation of changes per this report, the demand will not be there to bring these high occupancy values. Also, note that the predicted maintenance costs are about half of what Shoup predicted in a 2002 analysis of parking garages in Los Angeles ($33/space/month).

Transit Grants – This section should also include a statement that parking supply and subsidies, especially in the downtown are known to undermine and discourage transit ridership. B-TOP deplores the use of transit grants to build facilities for cars.

Parking Authority – Another suggestion might be the opposite of this, as it is in Portland. Parking is understood, there, to be a major player in what mode of transportation people choose, thus, it is definitely not autonomous, but under their Office of Transportation. Because it is a key player in managing travel demand, it should be under the department that is trying to control the demand of transportation. This statement is somewhat in the "disadvantage" column, but this point needs to be emphasized.

p. 85 – Parking metering is a fairly wholesale change.

p. 86 Off-street recommendations – 2. This needs to state that other downtowns are changing to parking maximums because building parking is costly, takes valuable space and discourages use of better modes of transportation.
Providing car-accommodations tends to maintain high rates of driving trips rather than transit, bicycle or walking trips. As a result, the downtown gets congested and the potential to bring in and have people downtown is significantly impaired.

OP-ED – Published March 3, 2007 in the Herald-Times

Guest Column,

The draft Downtown Parking Master Plan was unveiled this last Monday. It contains some very interesting statistics.

Of the 8229 parking spaces monitored in downtown, at peak use there were still 3066 vacant spaces. The Walker Parking Consultants' report gives some recommendations that seem quite reasonable; meter parking in core on-street spaces, eliminate reserved spaces for permit spaces, price parking according to supply and demand, use graduated parking fines that increase for each violation. All these will have the desired effect of improving efficient use of parking spaces. The report also discusses Travel Demand Management (TDM) policies, used heavily by universities and congested cities to reduce driving demand and increase transit, bicycle and pedestrian commuting. Where the draft report needs serious reconsideration is when predicting future demand.

The report describes 3 scenarios of future growth of 3%, 5% and 7%, supposedly based on historic trends, although no historic data are offered therein. Why are we contemplating continuing an historic trend when our city's Growth Policies Plan (GPP) and the mayor's Climate Protection Agreement both call for a change to this trend?

The growth of future parking demand is not outside community control. It does not happen independently and then the government must accommodate it. In fact, these predictions are often self-fulfilling; car use is commonly a result of government action. If you build to meet these predictions, you will get them. What we want in the downtown is

a growth in people, not necessarily cars. TDM policies have been successful in doing just this, bringing in people without cars, thus changing the historic trend while revitalizing urban areas with pedestrian-oriented place making. The University of Michigan, for example, reports avoiding the construction of 1300 parking spaces at a cost-savings of $17 Million only 2 years after starting a TDM program.

This report currently fails to specifically recommend TDM policies to the extent that the trend changes. Instead, it recommends meeting future parking needs using the status quo, car-oriented growth that has predominated the last 50 years. Is that what we want?

TDM policies are well documented by authors such as Todd Litman, Will Toor, Donald Shoup, Dom Nozzi, Robert Cervero and others. TDM successes are overwhelming, with the poster child being Portland, Oregon where commute-to-work transit trips exceed 13% and are increasing at 6% annually, biking is at 8% and increasing at 16% annually, and Single-Occupant-Vehicle (SOV) trips and miles are dropping, meanwhile Portland's downtown is considered the best in the nation.

Dr. Norman Garrick, Engineering professor at University of Connecticut, in his study and article titled *Parking at Mixed-Use Centers of Small Cities*, documents the dangers of excess and under-priced parking. He concludes, "Communities often overlook the possibility that a parking surplus may have undesirable consequences. Land unnecessarily consumed by parking is an opportunity lost for a more beneficial use, and uncalled-for parking also extends distances between points of interest, diminishing the ability of a town center to be pedestrian friendly."

His article also acknowledges that parking is not the horse, but the cart, "Instead of parking shaping the development of the town center, it should be the character and the vision of the town center that impacts the parking policy."

Dr. Garrick's work goes far beyond just parking. He has also been involved in a new draft document by the Institute of Transportation Engineers (ITE) that provides engineering design guidelines for walkable urban streets. Once finalized, this document could be legislatively adopted in communities and states.

Dr. Garrick will be giving a presentation entitled ***Street Design, Transportation Planning and Community Livability*** as part of B-TOP's Livable Cities Speaker Series, in the City Council Chambers at Showers on Monday, March 5th from 3:00-5:00pm. Please come for an interesting discussion on how we can help Bloomington set a new trend!

Buff Brown