Alki Pacific Planning

Access + Mobility + Parking + TDM

Date: 3/1/2018
To: Seattle City Councilmember Rob Johnson (District 4)
From: Kevin Shively, Principal, Alki Pacific Planning LLC
Re: CB 119173 - Off-Street Parking Flexibility and Availability: Review and Recommendations

Overview

In November 2017, the Mayor transmitted to Seattle City Council CB 119173, which is intended to expand the flexibility and availability of off-street parking in Seattle neighborhoods. Among other minor policy changes, CB 119173:

1. **Promotes efficient shared use of off-street parking,** including existing, but underutilized lots and garages,

2. **Maintains greater flexibility for off-street parking supply** in transit accessible areas, and aligns the definition of the frequent transit network with KC Metro scheduling practices, service patterns, and performance standards,

4. **Requires the separation of parking from the lease** of commercial space or residential space, to make pricing transparent and provide lower cost housing choices,

5. **Adjusts bicycle parking requirements** to align with professional best practices,

6. **Updates SEPA policies** related to parking and access, and

7. **Aligns Northgate parking regulations with those of other Urban Centers.**

CB 119173 and potential amendments were summarized and evaluated in two recent memos by Seattle City Council Central Staff in January 16 and February 1, 2018. The Seattle City Council Planning, Land Use and Zoning (PLUZ) Committee discussed the proposed reforms on January 17, and February 7, 2018, and a Public Hearing on CB 119173 was held on February 21, 2018.

Purpose

To inform deliberation on this important legislation, including consideration of potential amendments and complementary actions by the City, PLUZ Committee Chair Johnson requested consultant support to:

- review off-street parking legislation (CB119173) and supporting materials prepared by SDCI
- research national best practices for addressing project goals and issues identified through Council, staff, and public deliberation to date, and
- identify opportunities to amend the legislation, or to take other actions to address legislative goals.

Contents

This memo provides:

- a summary of key policy objectives of existing code provisions and proposed reforms,
- assumptions and principles of access and parking management relevant to policy evaluation,
- key considerations for legislative review and policy development,
- selected issues identified through Council, staff and public deliberation to date,
- relevant best practices from peer cities, and

- recommendations for amendments, complementary actions, and/or next steps to improve access and parking availability in Seattle neighborhoods.

Policy Goals for Reform (CB 119173)

The policy goals of CB 119173 are summarized in the SDCI Director's 2017 *Report and Recommendation for Neighborhood Parking Reform*. To support identification of potential amendments and implementation actions, the broad policy goals of reforming the City's existing approach to off-street parking supply regulation are listed and re-framed, as follows. CB 119173 on Off-Street Parking Flexibility and Availability is intended to:

- Provide access to new development,
- Maintain and improve access to nearby properties (within same neighborhood/urban village),
- Maintain availability of curb/ street parking in the area for use by residents, businesses, shoppers an visitors
- Improve the urban form and resulting vibrancy
- Remove hidden incentives to drive (free and below-market rate parking pricing), thereby reducing pollution
- Improve housing affordability by reducing project development costs and increasing the number of units that can be supplied on a given parcel under current zoning limits.

Key Assumptions and Planning Principles

Evaluation of the proposed legislation (CB 119173), and recommendations in this memo reflect key assumptions about the interaction of land use policies and transportation facilities and services, including principles of access and parking management, as follows:

- The broad **goal of transportation and parking** policies and programs is to **improve access for people and goods**
- **Means of access** include both **mobility** strategies, and **proximity** strategies (e.g. locating people, goods, services, and other destinations closer together).
- The **primary function of parking spaces is to provide access** to nearby places for people, and commerce, and/or a place for short, or long-term vehicle storage.
- **The City is primarily responsible for regulation and management of the use of curbside parking** areas,
- In many cities, **land use code requirements** for the provision of a minimum number of off-street parking spaces accessory to specific land uses and activities **were established with the goal of keeping on-street parking available;** or more broadly to maintain curbside access to nearby homes and businesses.
- However, minimum off-street **parking requirements are an indirect means of protecting on-street parking availability** for and access to other properties in the surrounding neighborhood
- **This indirect policy tool has very real impacts.** Required parking:
    - Lowers and/or hides the cost of parking from end users,[1]
    - Raises the price of goods, services, and housing,[2]
    - Subsidizes the cost of owning and operating motor vehicles,[3]
    - Increases driving (VMT),[4]
    - Makes transit service less efficient,[5]
    - Reduces land available for urban housing and commercial development,[6]

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[1] Shoup, Donald (2005). *The High Cost of Free Parking.* Chicago: APA Planners' Press.

[2] Jason Henderson (2009), "The Spaces of Parking: Mapping the Politics of Mobility in San Francisco," *Antipode* 41, No. 1 (2009): 77; Litman, Todd (2009), "Parking Requirement Impacts on Housing Affordability," Victoria Transport Policy Institute (January 2009); Shoup, D (2005).

[3] Weinberger, Rachel, M. Seaman and C. Johnson (2009), "Residential Off-Street Parking: Car Ownership, Vehicle Miles Traveled, and Related Carbon Emissions (New York City Case Study)," *Transportation Research Record*, no. 2118 (2009): 25.

[4] Richard Willson, "Suburban Parking Requirements: A Tacit Policy for Automobile Use and Sprawl," Journal of the American Planning Association 61, no. 1 (1995): 34; Litman (January 2009), 11; Weinberger, Seaman, and Johnson (2009), 2

[5] Henderson (2009), 77.

[6] Litman (January 2009), 9-10; Shoup (1997), 11.

- Encourages sprawling development patterns,[7]
- Even with ample off-street parking, **curbside parking can become congested if it is not managed properly.**
- Regulation and **management of parking on-street parking is a direct and efficient means of improving public parking availability** (It is also within the authority of the City).
- Because **oversupply of parking can generate traffic**, **it is sensible for the City to permit market-based right sizing of off-street parking supply** within walking distance of frequent transit corridors. This can help mitigate traffic associated with new development, and thus maintain transit speed and reliability in such corridors.

Summary: Issues and Recommendations

This section summarizes key considerations, best practices, and recommended amendments and next steps for each of several topics and issues addressed in the legislation, or highlighted in public comment or Council deliberation to date.

1. **Flexible Use Parking:** CB 119173 proposes to expand availability of off-street parking in selected areas by replacing "Principal Use" parking with "Flexible Use" (see 23.84A.038) parking, and making it legal to share, sell, lease, or otherwise enable public access to such non-required off-street parking. Council should amend CB 119173 to:

A. **Allow short-term or long-term flexible public use of required / accessory parking** (amending 23.54.027) if a parking demand study confirms that such parking is regularly underutilized.

B. **Provide direction for SDCI to develop specific design standards** for the placement and function of walkways, signage, and other wayfinding through adoption of a Director's rule, and/or publication of design guidance by the end of June 2019.

C. **Exclude single-purpose flexible use parking in multifamily districts,** downtown Harborfront 2 district, in SODO (square footage of flexible use parking may not exceed leasable floor area). Limit any flexible-use parking in the Harborfront 2 district to 'short-term' only.

2. **Parking in Transit Accessible Areas:** Current code defines areas with access to frequent transit service (in addition to Urban Centers and Villages) as eligible for flexibility in off-street parking supply. This memo recommends that Council:

a. **Define "frequent transit" as service with a scheduled average of at least four trips per hour** (~ 15-minute frequency) 6AM-7PM on weekdays, and at least two trips per hour (~30-minute frequency) on weekends, and from 7PM to 12AM on weeknights (The SDOT and SDCI alternative).

b. **Direct SDCI to develop on an annual basis, by director's rule, a map defining "frequent transit service** areas," including all property within one-quarter mile of frequent bus and streetcar stops and one-half mile of "high capacity transit" stations (Existing and funded Link Light Rail stations [PSRC def. of HCT]).

c. ***Alternative:*** **Allow parking supply flexibility in areas with *planned and funded* transit service**, assessing development project applications in relation to the transit service likely accessible in 2-4 years, upon project completion (and for the life of the building).

3. **Parking for Affordable Housing:** CB 119173 maintains off-street parking requirements of one parking space for every three to six residential units in below-market rate affordable housing projects. Council should:

[7] Litman (January 2009), 10-11;; Willson (1995), 36-37

a. **Exempt income restricted housing from off-street parking requirements citywide,** in light of the lower parking demand, higher transit ridership, and lower VMT rates of low-income households.

4. **Carshare Parking:** CB 119173 provides special exceptions to urban design rules of the zoning code and allows substitution of carshare parking for required accessory parking. Council should amend CB119173 to:

    a. **Eliminate urban design exceptions** allowing surface carshare parking in certain zones, and permitting additional curb cuts. These exceptions are less necessary to support carsharing, which is dominated by free-floating vehicles (e.g. ReachNow and Car2Go vehicles) utilizing curbside parking.

    b. **Reduce required accessory parking by three spaces for every one carshare parking space provided.**

5. **Unbundled Parking:** CB 119173 requires the separation of parking costs in lease agreements for commercial (10,000 sf or more), and residential space (in buildings with 10+ units). Council should:

    a. **Consider an amendment specifying a method or methods for pricing unbundled parking**, and/or a minimum charge (e.g. Bellevue's requirement that parking cost no less than a monthly transit pass).

    b. **Require regular submission to SDCI of documentation of compliance** with unbundling requirement.

6. **Transit Parking:** CB 119173 would permit shared-use park and ride lots, as well as new single-use park and ride lots/garages in selected areas outside of Station Area Overlay Districts. To access, Council should consider:

    a. **Permit park and ride facilities within existing (as of Jan. 1, 2018) parking lots, garages, and structures** outside of the Station Area Overlay District (SAOD), including within multifamily districts.

    b. ***Alternatives*** for accommodating transit parking, include:
        i. **Allowing agency sponsored park and ride facilities in SAOD with restrictions** applicable to flexible-use parking (e.g. parking area may not exceed leasable floor area on site).
        ii. **Required pricing: Authorizing shared park and ride facilities in certain areas**, on the condition that users be charged hourly or daily parking use fees at prevailing market rates
        iii. **Excluding development of new park and ride facilities, but authorize third party** marketing and use of flexible-use parking within transit corridors and the SAOD.

7. **Bike Parking Requirements and Guidance:** CB 119173 adopts new bike parking design and quantity standards that better align with national best practice, but would be strengthened by adopting amendments to:

    a. **Direct SDOT and SDCI to develop bike parking location, design, and operating standards** in collaboration with stakeholders (developers, architects, and bicyclists). This should include specific standards for short-term and long-term bicycle parking (including minimum space requirements), end of trip facilities (showers, lockers, changing rooms, etc.), and valet/attended bike parking.

    b. **Refine bike parking requirements for transit stations** by specifying that bike parking shall be provided at all transit stations and terminals throughout the City, in sufficient quantity to meet the 7% bicycle access mode share target within each corridor. Location, design, and operations standards set by SDOT Directors' rule, and allocation of total corridor-wide bike parking capacity completed by transit agencies (KCM and ST) with City input by June 2019.

8. **Off-street Parking Limits:** CB 119173 would eliminate selected exceptions to parking maximums downtown and establish a new limit of flexible use parking spaces per block. With better options for "flexible use" of existing,

but underutilized off-street parking, Council should take steps to develop locally appropriate limits on new parking supply in neighborhoods/districts across the City. Recommended amendments and next steps include:

a. **Amend CB 119173 to establish interim maximum off-street parking ratios** for residential (~1.25 space/unit) and non-residential development (~2.0 spaces/1,000 gsf) in urban villages, urban centers and frequent transit served areas.

b. **Direct SDCI and SDOT** to collaborate to:
   i. **Study off-street parking supply and utilization in relation to the built environment** and existing land uses in a selection of Urban Villages/Centers and frequent transit corridors by June 2019.
   ii. **Develop provisions allowing and facilitating the sale or transfer of rights to build parking** (up to the maximum allowance for a project) from one parcel to another within the same urban village, urban center, or FT corridor.
   iii. **Adopt these local parking limits (replacing the interim limits (8a) and parking transfer rules** by the end of 2019.

9. **On-street Parking Management:** As noted, minimum off-street parking requirements are an indirect and inefficient means of achieving the City's policy goals to maintain and improve neighborhood access, including the availability of curbside on-street parking. Council can address on-street parking challenges by:

a. **Extend performance-based parking management beyond existing paid parking areas** by adopting a goal to maintain no fewer than one to two parking spaces open and available on each block face at all times (~85% parking occupancy target) citywide.

b. **Provide direction and authority for SDOT to update on-street management policies and practices.** SDOT should conduct broader data collection and analysis in 2018 and early 2019, and return to Council in 2019 with a series of recommendations for better regulation and management to make it easier to find parking in Urban Villages/Centers, and frequent transit areas, as well as within Restricted Parking Zones for permit-holders and short-term visitors.

Discussion and Recommendations

For each significant issue and topic, this section provides: (1) a summary of existing code/ practice, (2) an overview of key changes proposed in CB 119173 (3) discussion, including reference to policies and practices in peer cities, and (4) recommended amendments, and/or complementary or supplemental Council actions.

1. Flexible Use Parking

At Issue: Rules for the location, design, conversion to and operation of flexible use parking. This section includes discussion of public access design guidance by SDCI and SDOT.

Currently, property owners may not sell or lease underutilized off-street parking, including parking provided in excess of current minimum off-street parking requirements for periods of time longer than four-hours (short-term parking). Consequently, parking demand that is not accessory to a specific land use with accessory parking is typically accommodated on-street, or in public or private off-street parking facilities ("Principal Use Parking").

CB 119173 proposes to expand the availability of off-street parking in selected areas by replacing "Principal Use" parking with "Flexible Use" (see 23.84A.038) parking, and making it legal to share, sell, lease, or otherwise enable public access

to such non-required off-street parking. The intent of this change is to improve parking availability by enabling public access to non-required private off-street parking which is often unused.

Flexible-use of required/accessory parking that is underutilized

The benefits of this flexible use parking policy would be substantially broadened by providing an option for property owners to make flexible use of that portion of any sites' supply of required accessory parking which regularly goes unused or underutilized. This would allow the traveling public to tap into the supply of available off-street parking that sits largely unused, even during peak hours (Note: *The King County Right Sized Parking Study* (2015) found that even during peak evening and overnight hours, approximately 30% of off-street parking associated with multifamily buildings in Seattle is unused), making it easier to find off-street parking and improving access to neighborhood business districts[8].

A. **Allow short-term or long-term flexible public use of required / accessory parking** (amending 23.54.027) if a parking demand study confirms that such parking is regularly underutilized.

Council could amend 23.54.027 (Public Use of Accessory Parking) to **allow underutilized parking accessory to residential or non-residential uses to be made available to the public for short-or long-term use** without a separate use permit. Flexible use of accessory parking would be permissible at the discretion of the SDCI Director, based upon evidence that the supply of such parking is not fully utilized for vehicle access and storage functions associated with the principal use for which the parking was originally intended to be accessory (as demonstrated in a parking utilization study completed by a professional transportation planner or licensed engineer).

Design for Public Access

CB 119173 provides a requirement (23.54.030) for public pedestrian access between flexible use parking areas and the adjacent street or public right-of-way. This is essential for such parking to provide access to land uses and activities in the surrounding area.

B. **Provide direction for SDCI to develop specific design standards** for the placement and function of walkways, signage, and other wayfinding through adoption of a Director's rule, and/or publication of design guidance by the end of June 2019.

Council could provide direction for SDCI to develop specific design guidance and/or requirements for design, placement, and function of walkways, signage, and other wayfinding through adoption of a Director's rule, and/or publication of design guidance by the end of June 2019. This should be completed following a brief study of the features and characteristics of public access in existing buildings and garages in flexible use parking areas, and outreach to off-street parking stakeholders, including property-owners, third-party parking operators, and public parking users.

SODO and Waterfront Parking

*CB 119173, permits (*23.49.148 and 23.49.324) by conditional use, construction of flexible use parking garages in the SODO and Waterfront areas, limited to short-term flexible use in SODO (e.g. less than 4-hours), and allowing short-term or long-term flexible use of parking facilities in the Downtown Harborfront 2 District. Otherwise, single-purpose facilities for flexible-use parking are prohibited in the adjacent downtown area.

Flexible-use parking in these near-downtown districts may encourage single-occupant vehicle travel to downtown and other Center City neighborhoods.

[8] King County (2015). Right Size Parking: Final Report. http://metro.kingcounty.gov/programs-projects/right-size-parking/pdf/rsp-final-report-8-2015.pdf

Options

Council may adopt the Executive's recommendation to allow single-purpose flexible use parking facilities in this area. Alternatively, Council may act to:

- **C1. Limit flexible-use parking in the Downtown Harborfront 2 District to short-term use** (as proposed for SODO), and/or
- **C2. Exclude single-purpose flexible use parking facilities in both of these districts**, instead adopting a requirement that square footage dedicated to flexible use parking on a site may not exceed the total floor area dedicated to residential or non-residential land use(s) on the same site (A similar provision is proposed in CB 119173 for the Station Area Overlay District, where the Executive seeks excludes development of single-purpose parking).

Single-Purpose Flexible Use Parking in Multifamily Districts

Councilmembers have questioned the efficacy of permitting the construction of new, single-purpose flexible-use parking facilities in multifamily districts. Concerns include reduction of the housing development capacity of such districts, impacts to the urban form, and traffic generation in already congested multifamily areas.

Options

Council may limit the applicability of flexible-use parking in multifamily districts by:

- **C3. Excluding single-purpose flexible use parking facilities in both of these districts**, instead adopting a requirement that square footage dedicated to flexible use parking on a site may not exceed the total floor area dedicated to residential or non-residential land use(s) on the same site (A similar provision is proposed in CB 119173 for the Station Area Overlay District), and/or

- **C4. Limiting flexible-use parking in such districts to structures/facilities existing** on or before January 1, 2018. This could **allow conversion to flexible-use of existing but underutilized parking** (whether required/accessory, or non-accessory) to increase the availability of parking in the area without substantial new parking construction.

2. **Parking in Transit Accessible Areas**

At Issue: Definition of "frequent transit service" areas for purposes of context appropriate parking requirements

As noted in the guiding principles for this evaluation, there is a strong argument for the elimination of minimum off-street parking requirements for all uses in all areas of the City. Rationale for eliminating code requirements includes: (1) reducing traffic, (2) expanding housing options and affordability, and (3) the availability of more direct options for providing neighborhood access, including expansion of transit, bike, and pedestrian facilities, and effective, demand-based management of on-street parking.

Currently, City code provides an exemption from minimum off-street parking requirements within Urban Villages, Urban Centers and frequent transit corridors. ***Reduced demand for parking in areas well served by transit is often provided as rationale for this exemption. However, elimination of parking mandates (and consideration of limits on off-street parking) within walking distance of frequent transit corridors is also justified as a means of promoting transit speed***

and reliability by preventing or limiting the growth of vehicle trips and arterial street traffic associated with new development.

In recent public and Council debate, focus has been drawn to questions over the appropriate definition of "frequent" transit service (based on scheduled, average, or actual service frequency?), the distance from frequent transit stops that should be considered frequent transit served areas, and the process for defining and amending such the FTS definition and area (by Council or SDCI Director's action).

Current code provides that "Transit service, frequent" means transit service headways in at least one direction of 15 minutes or less for at least 12 hours per day, 6 days per week, and transit service headways of 30 minutes or less for at least 18 hours every day." (23.84A.038).

CB 119173 provides that "frequent transit service," and frequent transit service areas shall be defined by Director's rule, with the Draft Director's rule proposed by the Executive defining frequent service areas as areas within ¼ mile walking distance of transit stops with "scheduled" service frequency meeting defined, but more flexible standards for weekdays and weekends (bus every 18 min. or better on applicable weekday/ Saturday hours, and 35 min. or better on applicable evening and Sunday hours).

Recommended Approach

The following approach is recommended to provide clear guidance for property owners and neighbors alike, based on a nexus between transit service**.** Planning for, funding, and supporting the operations (by King County Metro and Sound Transit) of transit services that are fast, frequent and reliable in key corridors throughout the City is essential to meet the City's goals for economic development and vibrancy, public health, social equity, and livability. It is appropriate for the City to **define a standard definition of high frequency transit service as a tool, not only for parking regulatory decisions, but also for transit performance evaluation, transportation budgeting, land use planning, and other purposes**. **The City Council should set a single transit service frequency standard** that reflects the value of service at sufficiently regular frequencies necessary for riders to consider the service (if meeting standard) to be reliable, fast, and usable without reference to a schedule.

A. Define frequency based on scheduled average service: An alternative measure developed by SDOT and SDCI is recommended for adoption by Council with amendment to CB 119173. This measure considers transit service to be frequent if it has a scheduled average of at least four trips per hour (approximately 15-minute frequency) 6AM-7PM on weekdays, and at least two trips per hour (approximately 30-minute frequency) on weekends, and from 7PM to 12AM on weeknights.

This definition is simpler to interpret and map than is a metric based on actual service frequency data. Although evaluation of service performance (on-time performance and actual frequency in relation to City and regional standards) is essential for management of transit operations (by KC Metro and Sound Transit), and the street right-of-way by SDOT, it is not appropriate for consideration in relation to development proposals which may not come to fruition for 2-4 years after approval in some cases. **Scheduled service (as opposed to actual service frequency) is appropriate to measure corridor service frequency for planning purposes** (including land use planning purposes), as it reflects fully funded service investments.

Evidence of poor on-time performance (and resulting in-frequent service gaps) on key corridors and corridor segments can best be used to inform investment by the City (through the Seattle Transportation Benefit District) and King County Metro in additional service hours, and transit priority measures (bus lanes, signal queue jumps, etc.).

B. Define Frequent Transit Served (FTS) areas annually in a map adopted by Director's rule: This approach allows the City to use new mapping technologies and address new access factors and research (e.g. dockless bikeshare) and to reflect City progress in completion of sidewalks, and other ped/bike facilities providing access to transit.

Define FTS Areas within one-half mile of HCT (Link) Stations, and one-quarter mile of frequent bus/streetcar: CB 119173 defines a parking requirement exemption for areas located within a ¼ mile walk of "frequent transit" stops or stations. This memo recommends that Council define the area to reflect differences in the capacity and walk access distance tolerance of two primary types of frequent transit service, including all properties within one half mile walking distance of "High Capacity Transit" stations (e.g. Existing and funded Link Light Rail Transit Stations) and all properties within one-quarter mile of frequent bus and streetcar services[9]. Puget Sound Regional Council (PSRC) has summarized the academic and professional literature on the relationship between land use patterns, access modes, and transit facilities and services and noted the following:

> *".. research supports several widely applied standards for estimating the practical walking distance to various modes of transit.* ***Typically, fixed-rail high-capacity transit will draw riders from within a 10-minute (1/2 mile) walk distance****. Bus transit typically draws riders from a 5-minute walk distance (1/4 mile). In planning for transit-supportive land uses, local governments should address steps to take full advantage of the existing walkshed as well as steps to expand the walkshed[10]."*

Best Practice: One-Half Mile Station Areas used in San Francisco MTC TOD Policy

Based on travel surveys and trip generation studies, planning and transit agencies across the nation use one-half mile -- a 10-minute walk for many people – as a measure of the distance that most travelers are willing and able to walk to access a high capacity transit station (e.g. light rail, heavy rail, or commuter rail) that provides regional transit access. Many agencies use this distance to define catchment areas for ridership forecasting, or for land use and access planning. In 2005, the San Francisco Bay Area Metropolitan Transportation Commission (MTC) adopted a Transit Oriented Development (TOD) Policy (Resolution 3434), which established thresholds for the minimum number of housing units that must either exist, or be authorized (by minimum residential densities allowed by zoning) for construction within one-half mile radius of each new rapid transit station (BART, BRT, Commuter Rail, or Ferry Terminal) station or terminal in the region in order for the transit project to receive federal or regional funding[11].

C. Alternative Approach: Exempt development in areas with planned and funded frequent transit service

As an alternative to the use of scheduled average, or recent actual frequency of transit service for establishment of areas eligible for right sized off-street parking, the City Council could direct SDCI and SDOT to develop a map reflecting the areas within walking distance of bus/streetcar stops and high capacity transit stations that are planned and fully funded for service expected to meet the Council established transit service frequency standard three years in the future. It would be appropriate to assess development projects against planned and funded transit service in this way, given that many residential and mixed-use development projects take up to three or four years from project approval to

[9] RCW 81.104.010 defines HCT as follows: "High capacity transit system means a system of public transportation services within an urbanized region operating principally on exclusive rights-of-way, and the supporting services and facilities necessary to implement such a system, including interim express services and high occupancy vehicle lanes, which taken as a whole, provides a substantially higher level of passenger capacity, speed, and service frequency than traditional public transportation systems operating principally in general purpose roadways." HCT includes various transit modes, including heavy rail, commuter rail, light rail, streetcar, and BRT [Bus Rapid Transit].

10 Puget Sound Regional Council (February 2015), "Transit-Supportive Densities and Land Uses: A PSRC Guidance Paper," Seattle, WA (p. 30).

[11] https://mtc.ca.gov/sites/default/files/Resolution%203434%20TOD_policy.pdf

occupancy. Strict schedule adherence today, is less important than planned and funded service upon building completion (2-3 years out).

Planned and funded transit service may be a better indicator of the transit service accessible to future residents of and visitors to buildings resulting from current project applications. SDOT and SDCI may reference King County Metro and Sound Transit's most recent Transit Development Plans (TDP's) in the definition of such three-year frequent transit network maps. This approach also affords SDOT the opportunity to account for planned (modal master plans) and funded (Move Seattle Levy, or otherwise) pedestrian facility improvements in the vicinity of transit stops that may expand the area within walking distance of existing or planned stations and stops.

3. **Parking for Affordable housing**

Regulation of off-street parking supply and unbundling for income restricted housing units

Outside of urban villages, urban centers and frequent transit served areas, CB 119173 maintains off-street parking requirements of one parking space for every three to six residential units in below-market rate affordable housing projects (the exact minimum ratio depends on the income restrictions for the project, with housing targeting the lowest income households required to provide the least parking (1 per 6 units).

Case Study: San Diego Affordable Housing Parking Study[12]

In 2011, the City of San Diego conducted an evaluation of off-street parking utilization at 34 affordable housing sites across the City, finding parking usage at approximately 50% of the rate found in typical rental units across the region. The study also confirmed that parking utilization was lower in areas with many walkable destinations and more transit service.

Recommended Amendment

A. **Adjust proposal to exempt income restricted housing from off-street parking requirements citywide,** in light of the lower parking demand, higher transit ridership, and lower vehicle trip generation rates of low-income households, and the City's current paramount interest in maximizing the quantity and reducing the cost of production of affordable housing units[13]. Exempting affordable housing from parking requirements would leave project sponsors to right-size their parking supply based on resident and service access and vehicle storage needs, and in light of the current conditions of on-street parking in the vicinity, the availability and cost of alternatives, and the cost and availability of long-term flexible use parking in the surrounding area.

4. **Carshare Parking**

At Issue: Appropriate urban design and substitution of carshare parking for required accessory motor vehicle parking

Provision of dedicated off-street parking for shared vehicles in private lots and garages is an important transportation demand management measure. CB 119173 provides special exceptions to urban design rules of the zoning code by permission of surface parking for up to three carshare vehicles between buildings and the street in certain zones, and allowance for additional curb cuts and street access for carshare parking. Required parking is also proposed to be reduced by one space for every carshare space provided off-street (proposed: 23.54.015.J.1).

[12] Wilbur Smith & Associates (2011). San Diego Affordable Housing Parking Study.

[13] For evidence of lower vehicle trip generation, see: Currans, Clifton, Gherke, Howell, and Norton (2018), "Transportation Impacts of Affordable Housing: Informing Development Review with Travel Behavior Analysis", *Journal of Transportation and Land Use*, Vol. 11 (1), p. 103-118.

Recommended Amendments

A. **Eliminate urban design exceptions allowing surface carshare parking in certain zones,** and permitting additional curb cuts. These exceptions may result in development that is detrimental to urban form and the pedestrian environment at street-level, and are less necessary to support carsharing, which is dominated by free-floating vehicles (e.g. ReachNow and Car2Go vehicles) utilizing curbside parking.
B. **Reduce accessory parking requirement by three spaces for every one off-street carshare space provided.** This is appropriate given evidence that on-site carshare parking can attract residents with fewer vehicles, and/or encourage resident households to reduce vehicle ownership and associated private parking demand.

Research and Best Practices:

- A 2014 study in San Francisco, CA revealed that providing on-site, off-street carshare parking, while unbundling the cost of reserved parking from rents was associated with significantly lower vehicle ownership[14]. Residents who were carsharing program members had significantly lower drive-alone trip rates than nonmembers.
- Montgomery County, Maryland and Vancouver, BC (CAN) allow one carshare parking space to substitute for the provision of three required accessory off street parking spaces in private developments[15].

5. **Unbundled Parking**

Applicability of required separation of parking from residential and commercial leases, and provisions for enforcement

Bundling reserved off-street parking space(s) with the lease for a residential unit or commercial space hides the cost of parking, and prevents tenants from realizing the potential cost savings of reducing their own vehicle ownership and parking demand. CB 119173 requires that parking charges be separately documented in rental agreements (7.24.030.G). This provision is applicable to all residential and mixed-use buildings with 10 or more unit, and most commercial use spaces with 10,000 sf or more of gross floor area.

Councilmembers may consider amending the unit and square footage thresholds for applicability of these unbundled parking requirements. One key consideration is the cost and effectiveness of monitoring and enforcement.

Best Practices:

- **Bellevue, WA:** Since the 1990's, Bellevue has required that off-street parking be unbundled from leases for housing in multifamily buildings, and commercial office space in the downtown area. Bellevue also requires that property owners charge for parking at a monthly rate that is equivalent to or greater than the cost of a monthly Metro transit pass (Note: The current cost of a monthly peak hour transit pass is $99)[16].

- **San Francisco, CA:** For downtown and other selected areas, the City of San Francisco requires that parking be separated from the cost of commercial and residential space in both lease and sale agreements[17]. This

[14] Hutchinson, Napolitan, ter Schure (2014), "Cumulative Impacts of Carsharing and Unbundling Parking on Vehicle Ownership and Mode Choice." *Transportation Research Record: Journal of the Transportation Research Board*, Vol. 2319.

[15] Referenced by the San Francisco Bay Are MTC, at: *https://parkingpolicy.com/reduced-requirements/*. Note that for residential parking, Vancouver code limits this 3:1 substitution to projects with 30 or more dwelling units.

[16] City of Pasadena (2006). Traffic Reduction Strategies Report, Appendix B – Case Studies (p. 16).

[17] See San Francisco Planning Code Section 167.

requirement is addressed in the City's Transportation Demand Management (TDM) program[18], which notes that:

> *"The property owner shall provide documentation demonstrating separate payment (or commercial availability) for each parking space. City staff shall verify that the cost of parking is not included in property rents or sale prices [and the property owner] will provide City staff with a signed letter agreeing to distribute [information about separate parking costs in] new employee packets, and tenant lease documents."*

Recommended Amendments

A. **Consider an amendment specifying a method or methods for pricing unbundled parking**. Because the cost of parking construction and operation, and market-rates for the short-term or long-term use of off-street can vary substantially from one neighborhood/site to another across the City, it is recommended that the City consider establishing a minimum charge for unbundled parking with some relation to the cost of parking operations, and/or the cost of transit alternatives.

B. **Enforcement:** As in Santa Monica, and San Francisco, the City should amend CB 119173 to **require regular (annual) submission to SDCI of documentation of compliance with these unbundled parking requirements.**

6. **Transit Parking**

Accommodation or exclusion of transit commuter and carpool/vanpool parking

The City of Seattle has long excluded the development of transit park and ride lots within City limits with the intent to:

- encourage use of other modes (transit, walking, biking) to access public transit stops and station
- encourage more productive and urban uses of land in transit station areas, such as that for housing, or commercial retail or office space, and
- to prevent attraction of additional vehicular traffic to the vicinity of transit stations.

Although some property owners near Link stations occasionally make unused parking available for commuters on a short-term, paid basis, no formal transit agency sponsored parking lots, garages or structures have been developed in the City in recent years with the exception of the Northgate Transit Center Park & Ride facilities.

King County Metro is seeking to develop opportunities for park and ride commuting across the County, including within the City of Seattle, by arrangement with property owners, and/or third-party operators to facilitate weekday daytime commuter parking within private off-street parking accessory to multifamily residential buildings.

CB 119173 would permit the development of such shared-use park and ride lots, as well as new single-use park and ride lots/garages in selected areas outside of Station Area Overlay Districts.

Council may consider amendments to prevent the development of park and ride facilities of any type in the City, or to exclude the development of single-use parking facilities in certain areas (e.g. multifamily districts). However, facilitating park and ride usage – particularly within existing but underutilized parking lots/garages – can increase transit ridership, and may reduce total vehicle miles traveled by providing new options for some commuters from less transit accessible cities and districts to reach downtown, or other employment centers by a combination of driving and transit, rather than by driving alone all the way to their destination(s).

[18] For information on the San Francisco TDM Program, visit: http://50.17.237.182/tdm/pdf/measure/pkg1.pdf)

Recommended Amendment

A. **Permit park and ride facilities within existing (as of Jan. 1, 2018) parking lots, garages, and structures** in multifamily districts (Parking would not be permitted to be developed as an isolated use). Permission for occupancy of such parking by commuters shall occur only after a supply and utilization study for the district has been completed and corresponding maximum limits on the supply of off-street parking have been established/adopted for the surrounding area. With area parking limits in place, there should be little concern by the City for how people are using publicly accessible parking spaces and why.

Options:

- **B1. Permit agency sponsored park and ride facilities, with the same restrictions as flexible-use parking** in the Station Area Overlay District (parking area may not exceed the gross floor area of commercial or residential space in the district) and a new requirement that any park and ride spaces be made available only as paid parking at market rates for commuter parking, or the estimated cost to build, operate and maintain off-street parking.
- **B2. As a TDM measure, Council may authorize shared park and ride facilities in certain areas,** on the condition that users be charged hourly or daily parking use fees consistent with prevailing market rates (e.g. pro-rated from average monthly parking rates charged to commuters, residents, and/or commercial tenants in unbundled parking transactions (see 23.47A.006).
- **B.3**.Council could maintain exclusion of new transit park and ride facilities throughout the city, but **enable third party marketing to and use of flexible-use parking by transit patrons** in transit corridors (established FTS areas) and/or within the Station Area Overlay District (SAOD).

7. **Bike Parking Requirements and Guidance**

Aligning bike parking and shower/locker requirements, and facility design guidance with BMP and other City goals.

CB 119173 amends the bicycle parking requirements in the land use code (23.54.015), adopting new design and quantity standards that better align with national best practice and guidance from the Association of Pedestrian and Bicycle Professionals (APBP). Public and Council deliberation on this legislation has centered on four key questions: (A) guidance for the location, design and features of short-term and long-term bike parking, (B) whether or not to exempt space dedicated to bike parking from project FAR calculations, (C) project thresholds for requirement to provide end-of-trip facilities (e.g. showers, lockers), and (D) quantity and type of bike parking to be required at regional transit stations and terminals.

Guidance for Location and Design of Bike Parking

CB 119173 defines use specific requirements for short-term (up to 4 hours) and long-term (greater than 4-hours) bicycle parking, but does not contain specific guidance or standards for the location and design of such parking. Public commenters have noted that many architects and developers would appreciate and utilize clear standards and guidance in this area.

Recommended Amendment

A. Amend CB 119173 to **provide Council direction to SDOT and SDCI to collaborate with stakeholders (developers, architects, and bicyclists) to develop and promulgate location and design standards** for short-term and long-term bicycle parking and end of trip facilities (showers, lockers, changing rooms, etc.). Such design standards shall be adopted by Directors' Rule (SDCI) by June 2019, and be applicable in the development review process.

In addition to short-term (typically racks), and long-term bike parking (storage rooms, or lockers), **design guidance should address guidance for:**

- **Location**: Short-term bike parking should be located within 50 feet of primary building entrance(s).
- **Short-term parking for shared bikes,** including both dockless bikeshare bikes, and informally shared bikes: The Director's rule shall address the questions of (1) what if any share of code-required short-term bike parking may be satisfied by provision of space for off-street parking for shared bikes, and (2) whether the land use code should be amended in 2019 to specify requirements for shared bike parking areas (in addition to required short-term parking for private bicycles). This direction should be based on evaluation of bikeshare utilization trends and parking issues identified by SDOT in 2018.
- **Valet, or otherwise attended bike parking**. The Director's rule should specify standards (e.g. space requirements, location, and hours of operation) for valet /attended bike parking, and the share of code required short-term and long-term bike parking that may be substituted for by provision of valet/attended bike parking.
- **Space requirements:** Minimum square footage of floor area, or other dimension specifications to ensure that each bike parking space (whether short-term or long-term) is usable.

Best Practices: Portland Bike Parking Stakeholder Advisory Committee (SAC) Recommendations

Portland, Oregon is developing and planning to incorporate design guidance for bike parking into its municipal code. The Bike Parking Stakeholder Advisory Committee (SAC) was convened by the Portland Bureau of Transportation (PBOT) in 2016 and 2017 to inform legislation to update bicycle parking standards in the City's land use code planned for adoption in 2018[19]. Relevant guidance recommended by the SAC, includes:

- A minimum footprint of 2'x6' per bike parking space for both short-term and long-term bike parking
- Location of required short-term bike parking within 50' of a primary building entrance.
- Cargo/trailer bike accommodation: Where more than 20 bike spaces are required, a min. of 5% of required spaces should allow a footprint of 3'x10' to accommodate cargo bikes and bikes with long trailers.
- Electric bike accommodation: Where more than 20 bike spaces are required, an electrical outlet shall be provided for each of at least 5% of bike parking spaces (signed for priority use by electric bikes).

FAR Exemption

Currently, bike parking is defined as an allowable street-level use that is exempt from FAR limitations downtown. Council may consider exempting some or all required long-term covered bicycle parking from FAR limitations in other districts outside of downtown. This is largely a design and urban form question, with minimal impact on site accessibility or travel patterns. If no FAR exemption is provided in areas outside of downtown, the bicycle parking design standards specified in a future director's rule should specify appropriate locations for bike parking to ensure that it does not impede on or substantially reduce the function of required common spaces/areas.

End of Trip Facilities

The presence of showers, lockers, and changing areas at their destination is essential to encourage long-distance, and/or all-weather bicycle commuting. CB 119173 would require the provision of at least two showers for use by bike commuters in buildings with 100,000 or more sf of gross floor area.

[19] Hormann & Figliozzi (2017). Report of the Bicycle Parking Stakeholder Advisory Committee (SAC): Recommendations on the Bicycle Parking Code Update 2016-2017, Portland (OR) Bureau of Transportation (PBOT).

Recommended Amendment

Council should lower the gross floor area threshold for required provision of showers and lockers for bike commuters from 100,000 to 20,000 gsf, consistent with practices in peer cities.

Best Practice: San Francisco, CA: In 2013, San Francisco amended its planning code (155.4) as follows:

Use	Gross Floor Area	Required Showers	Required Lockers
Entertainment, Arts and Recreation Uses; Industrial Uses; Institutional Uses; Non-Retail Sales and Services Uses; Utility and Infrastructure Uses; Small Enterprise Workspace; and Trade Shop	10,000-20,000 sf	1	6
	20,000-50,000 sf	2	12
	>50,000 sf	4	24
Retail Sales and Services Uses, except as listed above	25,000-50,000 sf	1	6
	>50,000 sf	2	12

Bike Parking at Transit

Per amendment to 23.54.015 Table D.E.4, CB 119173 would require "long-term" bike parking for 5% of projected AM peak daily ridership [transit station boardings and alightings], and "short-term" bike parking for 2% of projected AM peak daily ridership. Council Central Staff have noted concerns of King County Metro and Sound Transit with this requirement, including the specifications it requires for station and site design.

To meet the City's ambitious goals for bicycle and transit mode share, substantial bike parking should be provided at transit stations and terminals throughout the City. The quantity of bike parking provided within each transit corridor should align with the access mode split goals of the City and the transit agency respectively.

Recommended Amendment

B. **Amend 23.54.015 Table D.E.4 to specify that bike parking shall be provided at all transit stations and terminals throughout the City, in sufficient quantity to meet the 7% bicycle access mode share target within each corridor** (e.g. the total of all bike parking at all stations in the corridor should be sufficient to accommodate 7% of projected AM peak period ridership in the corridor). Examples of transit corridors, subject to such mode-split goal based targets include the Northgate Link (all Link Stations from Capitol Hill to Northgate). Bicycle parking accommodations may be higher at some stations with high connectivity to local and regional bikeways (e.g. UW Station, which is connected to the Burke Gilman Trail and the SR-520 Bicycle and Pedestrian Path), and lower at others (e.g. Northgate Station) so long as the total quantity of bicycle parking provided at all stations in the defined corridor can accommodate the share of projected AM peak transit ridership in the corridor necessary to meet City established mode share targets.

   Specifications for the design, location, space and operation of bike facilities shall be established by SDOT and SDCI in the Director's Rule for Bicycle Design Standards, to be adopted by the end of June 2019, with input from stakeholders, including direct consultation and collaboration with transit agency staff and their consultants.

Allocation of corridor required bicycle parking between stations shall be completed by the transit agencies by the end of June 2019, working in close consultation with SDOT, SDCI, and public stakeholders.

Best Practice: San Francisco BART Bicycle Access Plan

In 2012, the San Francisco Bay Area Rapid Transit District (BART) adopted the BART Bicycle Plan, which established a goal of doubling bicycle access mode share to 8% of all trips system-wide by 2022. The Plan includes strategies for improving bicycle circulation near stations, accommodating bikes on new BART cars, increasing vehicle parking fees to encouraging walk, bike and transit access, and supporting local government action to improve station access. At the heart of the plan is a commitment to expand secure bike parking within BART station fare gates, and at attended "Bike Stations," in adjacent buildings. These types of bike parking are perceived to be more secure than bike racks located outside of station entrances and are much more heavily used.

8. **Off-Street Parking Limits**

Process for development of context appropriate limits on the supply of off-street parking in areas outside downtown

The City of Seattle land use code currently specifies maximum limits on the number of off-street parking spaces that can be provided in association with certain commercial development projects downtown. CB 119173 would eliminate selected exceptions to these existing downtown limits, which were established to prevent the oversupply of parking and limit the growth of vehicle traffic and associated congestion within the Center City area. The proposal also limits the provision of flexible use parking spaces to 145 spaces per block.

With the proposed allowance for flexible-use of existing, but underutilized parking expanding parking availability in neighborhoods outside of downtown, it is appropriate for Council to consider establishing maximum limits on all new off-street parking in such areas. Maximum limits on the supply of off-street parking would be particularly appropriate for new development in the Station Area Overlay District and other frequent transit served areas in order to prevent or mitigate growth in traffic and congestion on transit priority streets, with associated impacts to transit speed, reliability and capacity.

Best Practices: San Francisco, CA Neighborhood Parking Maximums

San Francisco has adopted localized maximum off-street parking limits for its downtown, and most of its Eastern Neighborhoods through neighborhood planning processes. For multifamily residential and mixed-use projects, these limits vary by neighborhood from 0.5 spaces per residential unit in Rincon Hill to 0.75 spaces per unit in the Market/Octavia area. A recent study in San Francisco found that residents of neighborhoods without off-street parking limits made more than twice many (2.2 vs. 0.86) daily single occupant vehicle trips, and half as many daily bicycle trips as residents of comparably dense neighborhoods with parking maximums[20].

[20] Sherman, Alyssa B. (2010). "The effects of residential off-street parking availability on travel behavior in San Francisco," *A Planning Report Presented to the Faculty of San Jose State University*, Dept. of Urban and Regional Planning.

Parking Maximums in Peer Cities

City	Exemplary Parking Maximum(s)
San Francisco, CA	0.5-0.75 spaces per dwelling unit (varies by neighborhood)
New York, NY	0.2-0.35 spaces per dwelling unit (Manhattan)
Portland, OR	0.7 spaces/1,000 gsf commercial uses 1.25 spaces per dwelling unit (Center City Neighborhoods)

Recommended Approach

Establishment of maximum off-street parking limits is appropriate for all Urban villages/Centers and areas served by frequent transit. However, the City must be careful not to apply maximums by use that are so limiting as to prevent desirable residential, commercial, and/or mixed-use development that is consistent with the Seattle 2035 Comp Plan.

Maximum limits on the supply of off-street parking accessory to new development are currently codified for certain land uses and areas in the Downtown, South Lake Union, Northgate, and U District Urban Centers. Expanding the application of maximum parking limits to other Urban Centers, Urban Villages and areas accessible to Frequent Transit service can help achieve the City's transportation and housing affordability goals. Such limits would promote housing affordability by reducing the cost of development. Expanded maximums on residential uses and a wide range of non-residential uses (per Land Use Code parking categories in Section 23.54) would also encourage use of non-auto travel options by promoting the efficient shared use of existing and new off-street parking, with market-based pricing (as opposed to free or underpriced parking, where parking is oversupplied, which in turn encourages driving). Limits could be defined in relation to Urban Village types and/or vary depending on neighborhood characteristics.

For example, it may be appropriate to adopt lower limits on the supply of new off-street parking in urban villages/centers such as Northgate that have a large supply of existing off-street parking, and relatively low average utilization (where existing, but underutilized parking can support new development with little or no parking), while permitting slightly greater supply of new off-street parking in urban villages such as Ballard, with more historic structures, minimal off-street parking, and higher on-street and off-street parking occupancy rates.

A. **Adopt interim limits on off-street parking** for Urban Centers/Villages, the Station Area Overlay District (SAOD), and areas served by frequent transit service. Recommended interim limits for such areas, outside of downtown, are: **1.25 spaces per residential unit**, and **2.0 spaces per 1,000 gsf for non-residential space**. The intent would be for these interim limits to be replaced in 2019 with specific limits for each Urban Center, Village, Station Area and frequent transit corridor, based on data collected and analyzed by SDOT and SDCI in 2018/2019.

B. **Provide direction and authority for SDOT to update on-street management policies and practices.**
   - **B1. Collect and Analyze Off-Street Parking Supply and Utilization in Relation to Units/Floor Area by Neighborhood:** Additional work by SDOT and SDCI, with consultant support, is recommended to provide essential data and a data-driven method for establishing appropriate parking limits for Urban Centers, Urban Villages and areas accessible to FTS. The scope of work would include collection of data on the supply, utilization, and public accessibility of off-street parking, for a sample of representative buildings/properties in different parts of the City. This would allow the City to account for different parking usage patterns, and supply ratios in differentiating maximum limits by area.

   - **B2. Facilitate Transfer of Parking Allowances or Credits within Urban Villages/Corridors:** SDOT and SDCI should also be directed to develop provisions allowing flexibility to exceed maximum parking limits on a given site/parcel, by an amount commensurate with and tied to other properties/projects in the same urban

village, center, or corridor that have supplied, or commit to supply parking at an equivalent amount below the established maximum limits for the use/area. This would effectively enable the limited private transfer of allowable off-street parking supply from one site to another within a defined geographic area.

9. On-Street Parking Management

Complementary actions to maintain access and parking availability in FTS areas and other growing neighborhoods

As noted, minimum off-street parking requirements are an indirect and inefficient means of achieving the City's policy goals to maintain and improve neighborhood access, including the availability of curbside on-street parking. In addition to investment in and prioritization of non-auto modes of access and mobility (transit, bicycling, and walking), the most direct and efficient way to achieve these goals is through the **effective management of on-street parking.**

Regulation, pricing, and management of parking in the public right-of-way is within the direct authority of the SDOT director and is the most direct and effective means of achieving the goal of maintaining parking availability (and thereby auto access) throughout Seattle neighborhoods.

SDOT's Performance-based management program targets the Council adopted goal of 85% occupancy of on-street parking (leaving one to two parking spaces open on each block at all times) with annual data collection and administrative adjustment of parking meter rates, hours of operation, and time limits by SDOT, as needed. SeaPark is a national best practice that has improved the availability and accessibility of curbside parking within paid parking areas substantially since it was first implemented in 2010.

Recommendation: On-Street Parking Management

Adjustment of on-street parking policies is outside of the current scope of CB 119173, however **Council should signal its support for complementary reforms to improve the management of parking inside and outside of paid parking areas**. To maintain and improve parking availability and access in urban villages, urban centers, and frequent transit corridors, and other areas experiencing substantial new development, Council may consider expansion of its successful performance-based parking management program to areas with congested on-street parking outside of paid parking areas.

A. As a first step, **Council may adopt a similar goal to maintain no fewer than one to two parking spaces open and available on each block face at all times (~85% parking occupancy target) citywide.**

B. This may be combined with **direction and authorization for SDOT to conduct initial data collection and analysis, and to return to Council in 2018 and 2019 with a series of recommendations** for regulation and management of parking in areas outside of existing paid parking districts. This may include measures such as reforming the City's Restricted Parking Zone (RPZ) program to make it easier to find parking with an RPZ permit.