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MEMORANDUM

To: Mike Nilsson

From: Bonnie Nelson and Phil Olmstead

Date: May 19, 2010

Subject: City of Glendale – Preferential Parking District Program Peer Review

Overview

This memorandum provides a summary of the City of Glendale's preferential parking district program[1] and a peer review of preferential parking programs in other cities. The memo also discusses the legislative requirements and limitations of preferential parking programs which will serve as a guide to Glendale as it considers changes to its current requirements.

The peer cities included in this memorandum include both geographic peers and "best practices" cities. The geographic peers enable Glendale to compare itself against municipalities that operate within a similar regional transportation and regulatory environment. The other case studies are provided to show current best practices in preferential parking districts and indentify potential new frameworks Glendale might consider as part of a parking management program. It is important to note that not all of the "innovative" approaches identified here are necessarily appropriate for implementation in Glendale. Rather, these strategies are intended to help the City, its partner agencies, and other stakeholders learn from the experience of other communities.

Background of PPDs

What is a PPD?

A preferential parking district (PPD) program operates by exempting permitted vehicles from the parking restrictions and time limits for non-metered, on-street parking spaces within a geographically defined area. PPDs are typically established to respond to parking spillover from nearby parking generators such as commercial districts, schools, hospitals, or major employers. A common PPD is one that only allows those without a permit to park for only two hours during a specified time frame, commonly 8:00 a.m. to 6:00 p.m., Monday to Friday. Permit holders are exempt from these regulations and able to essentially store their vehicle on the street, although holding a permit does not guarantee the availability of a parking space. The times and lengths of restrictions can be flexible and determined on an individual basis.

PPDs work best in neighborhoods that are impacted by spillover from other uses, particularly competing demand from employees at nearby businesses or at large institutions such as hospitals or colleges. PPDs are also commonly used in neighborhoods that are impacted by

[1] Such districts are also often referred to as a residential parking permit (RPP) programs.

regional commuters who might want to drive and park in a neighborhood that has convenient access to a transit node, such as a rail station or major express bus line. PPDs generally are less beneficial in neighborhoods where parking capacity cannot meet the demand of local residents and where there is limited competition from non-residents for local on-street parking spaces.

PPD Legal Standing

The California Vehicle Code (CVC) authorizes local jurisdictions to limit or prohibit parking on local streets and roads. The CVC also allows the creation of a preferential parking program for residents and merchants to exempt them from such regulations (CVC Section 22507)[2]. Section 22507 states:

> (a) The ordinance or resolution may include a designation of certain streets upon which preferential parking privileges are given to residents and merchants adjacent to the streets for their use and the use of their guests, under which the residents and merchants may be issued a permit or permits that exempt them from the prohibition or restriction of the ordinance or resolution. With the exception of alleys, the ordinance or resolution shall not apply until signs or markings giving adequate notice thereof have been placed. A local ordinance or resolution adopted pursuant to this section may contain provisions that are reasonable and necessary to ensure the effectiveness of a preferential parking program.
>
> (b) An ordinance or resolution adopted under this section may also authorize preferential parking permits for members of organizations, professions, or other designated groups, including, but not limited to, school personnel, to park on specified streets if the local authority determines that the use of the permits will not adversely affect parking conditions for residents and merchants in the area.

Section 22507.2 also states that "The local authority may charge a nonrefundable fee to defray the costs of issuing and administering the permits." As discussed later in this memo, however, most preferential permit programs are not cost neutral.

It is also important to note that there is ongoing debate regarding the amount of flexibility the CVC allows for when developing a preferential permit program. Many cities have taken a more "conservative" approach and have adhered to the specific language of Section 22507, which states that permit fees may only generate enough revenue to cover program costs and administration. On the other hand, more "creative" approaches have been put forth arguing that the CVC grants local jurisdictions much greater flexibility when designing their permit programs, as long as they are "reasonable and necessary to ensure the effectiveness of a preferential parking program." A recent parking study[3] by the San Francisco County Transportation Authority (SFCTA) summarizes this argument:

> "If the appropriately-priced permits are part of an overall program to improve neighborhood on-street parking, higher permit fees would be integral to achieving program objectives by managing demand through price. If revenues are reinvested programmatically in transportation, such a program would meet the parameters of a user fee…In other words, higher preferential permit prices would be expected to meet state legal requirements if such fees are tied to making the program work (by improving parking conditions) and if net fee revenues are used to support the program's goals (improving parking through parking-related investments and projects

[2] For more information, see the CVC at http://www.dmv.ca.gov/pubs/vctop/vc/tocd11c9.htm or Appendix B.

[3] SFCTA (2009). "San Francisco On-Street Parking Management and Pricing Study – Final Report." http://www.sfcta.org/content/view/303/149/

that help to manage parking demand, including investments in non-automobile modes)."

Ultimately, any city's decision around the level of preferential permit fees will be made after close consultation with their city attorney. The intent of this memo is not to provide legal advice, but rather to provide the City of Glendale with a variety of approaches to revising their preferential permit program.

Limitations of PPDs

PPDs are a very common practice in California and numerous jurisdictions employ a PPD in one form or another. Once again, PPDs have historically been established in response to parking spillover into a neighborhood from non-residents using nearby services. Most PPDs do meet their objective of limiting or eliminating long-term spillover parking into residential areas. As the number of cities that operate PPDs continues to grow, however, the limitations of PPDs have been more easily documented. Identifying these limitations can be a helpful step in ensuring that a PPD is as efficient and cost-effective as possible. Some of these key limitations include:

- PPDs alone may not adequately address the mismatch between the limited supply of on-street parking and the high demand for this parking at its current below-market price:
    - The issuance of PPD permits **is often not linked to the actual supply of parking spaces** and many PPD programs do not limit the number of permits that can be allocated to a household. Consequently, the number of permits issued solely to residents is far greater than the actual supply of parking spaces within a given district. In Boston's Beacon Hill neighborhood, for example, the City's Department of Transportation has issued residents 3,933 permits for the 983 available curb spaces in Beacon Hill's residential parking permit district, a 4-to-1 ratio. In such cases, a resident permit becomes little more than a "hunting license." This problem is particularly acute in cities that create very small districts, where it may be virtually impossible for most residents to park on the street even after the district is formed. As parking permits become more expensive, residents may be increasingly irritated by the fact that they have to buy a permit and still cannot find parking.
    - Many PPDs either **give their parking permits away for free or charge very little**, which fails to provide any disincentive for residents to park on the street. The more expensive the parking permit is the more likely it is that residents will clean out a garage or park farther away, especially with multiple vehicles. Very high parking fees may encourage a shift to other travel modes, or elimination in marginal vehicles.

      Cities also **often fail to recover the full costs of their parking permit program** because they fail to account for all of the operational and administrative expenses. For example, none of the case studies analyzed here explicitly charge for the permit application process. Most charge for the permit itself, but none have instituted an application fee. Some programs may account for those costs in their permit fee structure, but it is much more likely the cities reviewed here have not attempted to fully account for those costs.
    - PPDs **do little to manage parking during most periods of high demand**, such as in the evenings near popular commercial corridors when competition for parking spaces is high between residents returning home from work and individuals wishing to access nearby businesses. Most PPDs end at 6:00 p.m. on weekdays and are not in effect on weekends. If the non-permit time limit is 2-hours, this essentially means that parking is wholly unregulated beginning at 4:00 p.m. in locations where PPD regulations end at 6:00 p.m. In many neighborhoods, the

highest parking demand is late afternoon and early evening, as residents return home with their cars while employees in the area have not yet departed.

  - PPDs create **an arbitrary distinction between commercial and residential streets and zones**. Parking in commercial districts is often managed with parking meters or garages, while an immediately adjacent residential street has "free" on-street parking. By creating "commercial" and "residential" streets, PPDs fail to holistically manage the entire parking district. The end result of allowing 2 hours of free parking for non-residents is over-used parking in the neighborhoods while more expensive parking in the business district may be underused.

- PPDs **generally benefit a narrow class of users**, namely those residents that wish to park their car on the street during the weekday. Many residents drive their car to work, vacating the PPD for the day. As a result, valuable on-street parking spaces that could benefit other users are underutilized and mismanaged. Programs that combine PPDs with daytime metered parking for non-residents have the added benefit of being able to adjust the charges for non-permitted parkers, while raising revenue that can be spent on neighborhood improvements and maximizing the utilization of all parking spaces all of the time. See the Hermosa Beach, Tucson, and Del Mar case studies for more information.
- PPDs **can promote the "2-hour shuffle,"** where non-residents move their cars to avoid parking enforcement. This shuffle results in highly localized traffic, congestion, noise, and pollution.
- PPDs can **create an environment of "permit permanence."** While most municipal codes allow for the dissolution of PPDs, almost no PPD is ever revoked once it has been established. Therefore, even if the parking characteristics of a neighborhood changes, it is unlikely that the PPD will adjust to meet those changes.
- Most PPDs **are established in an ad hoc fashion** based on resident complaints and petitions. PPDs also have varying sizes and regulations and are rarely coordinated across a city. The end result is a disjointed and confusing regulatory framework for the public.

Despite all of their potential limitations, PPDs continue to be a popular parking management tool not only in Glendale, but in municipalities across the country. At the same time, many cities have begun to reevaluate how they operate their PPDs and have established certain provisions that seek to manage parking in a more measured and data-driven manner. The following sections outline Glendale's current PPD program, as well as highlight how other cities have approached the management of similar parking challenges.

Summary of Glendale's PPD Program

The City of Glendale has a number of preferential parking areas[4], in which residents receive a permit to park for unlimited duration on the street while non-permitted motorists from outside the neighborhood may park for a limited number of hours. PPDs are dispersed throughout Glendale with a number located on the edges of the Downtown Specific Plan area. Hours and days in which the permit restrictions are in effect, as well as the actual time limits imposed for non-residents, vary from street to street. In 2005 Glendale issued approximately 1,500 resident permits, in addition to multiple guest permits. A summary of the key provisions of Glendale's existing PPD regulations[5] are as follows:

- To initiate a PPD, the Glendale municipal code requires that "…residents in the area shall provide a petition signed by residents living in at least seventy-five percent of adjacent dwelling units in the area proposed for designation."

[4] See Appendix A for a map of Glendale's PPDs as of 2006.

[5] See Appendix C for the full text of the Glendale municipal code as it pertains to PPDs.

- A parking study must be completed that shows a demonstrated problem of spillover parking with at least 25% of cars being non-resident owned.
- $6 annual fee per permit.
- Unlimited number of permits per household/neighborhood.
- 2 free guest permits per car in household.
- If residents want to expand an existing preferential parking district, they must do so within one year of the date from when the original district was formed.

> "10.36.030 (B). Designation of Preferential Parking Districts. In order to reduce the secondary impacts of the establishment of preferential parking districts, the transportation and parking commission may authorize the traffic and transportation administrator to expand the area of any established preferential parking district to encompass other adjacent streets surrounding a district. Residents who desire preferential parking in said expanded area must first meet the prerequisites for establishment of preferential parking districts as set forth in subsection C of this section no later than one year from the establishment of the original district."

As discussed in the 2006 *Downtown Glendale Mobility Study*, and consistent with the PPD limitations discussed above, the structure of Glendale's existing PPD program may actually contribute to parking management problems, rather than fully solving them:

- Allowing 2 hours free parking for non-residents can result in over-used parking in the neighborhoods while paid parking at the employment site or in a garage may be underutilized.
- Employees can move their cars when they become concerned about enforcement, doing the "2-hour shuffle." Visitors to local businesses can also park in the neighborhoods and "shuffle" to avoid meters and/or paid parking.
- The City issues an unlimited number of resident permits for a limited number of spaces. There is no relationship between the number of permits issued in total or to any one household and the amount of space available.
- With a mere $6 annual fee, demand exceeds supply, and the program does not cover operating costs, as is required by City Code.
- The current petition process makes it difficult to collect signatures in multifamily zones and areas with renter-occupied housing units. The number of units in one building and high rates of renter turnover makes it difficult to meet the 75 percent approval threshold.
- Despite its description in the municipal code, Glendale PPDs are not "districts," but rather small street segments or individual blocks. Glendale currently has more than 100 separate street segments classified as a PPD with varying types of regulations. The fragmented nature of Glendale's permit program prevents a cohesive parking management strategy, makes administration and enforcement difficult, and can be confusing to the public.

Peer Review of PPDs

A survey of nearby cities reveals that the City of Glendale's PPD program is similar to its geographic peers. However, other cities, both in the greater Los Angeles region and elsewhere across the country, have sought to become more "innovative" in their parking management by incorporating certain elements within their PPD programs, such as tiered pricing, permit maximums, linkage between number of permits and available parking, non-resident purchases,

and the use of revenue to fund transportation programs. All of these case studies are discussed below[6].

Geographic Peers

For this analysis, the PPD programs of six geographic peers were analyzed: Burbank, Culver City, Pasadena, Long Beach, Santa Monica, and Santa Ana. Figure 1 summarizes the findings and outlines the key provisions of each program, as well as any notable practices. For the most part, all of these programs are similar in their structure and include a common set of regulations, including:

- Petition process with resident approval thresholds in the 66-75 percent range.
- Required parking and occupancy study for residents and non-residents[7].
- Allocation of a set number of resident/guest permits, typically independent of parking supply.
- Permits allocated for free or nominal cost.

At the same time, there are a number of differences between Glendale and its geographic peers that do emerge. **First, the City of Glendale, along with Culver City, has the highest resident approval threshold for a new PPD at 75 percent.** By contrast, all of the other geographic peers surveyed require a 2/3 majority. Glendale's high approval threshold can make it very difficult to get a new PPD established or revised, especially in an area with a high number of renters.

Like most cities Glendale's PPD program requires a parking occupancy study of the proposed area, but **Glendale has a lower threshold for the number of non-resident vehicles that must be counted to justify a PPD.** For example, Glendale requires that only 25 percent of cars in a study area be non-resident, while Pasadena requires 40 percent, Long Beach and Santa Monica require 50 percent, and Burbank requires 70 percent. Such a low threshold can easily trigger the establishment of a PPD that may ultimately not be effective.

Glendale makes more permits available per household than any of its peers. Glendale puts no cap on how many permits a household can have or how many permits are allocated within a neighborhood. Most of Glendale's peers do put a cap on the permits they allocate. For example, Pasadena and Long Beach allocate three permits per household, while Santa Monica allocates only one permit per household. These caps, however, are not necessarily linked to the actual supply of parking spaces.

Some of Glendale's peers, such as Santa Monica, Pasadena, and West Hollywood, have taken a district-based approach to establishing the preferential permit areas. Unlike Glendale, which creates districts out of individual street segments, these cities have established larger self-contained districts that have consistent permit regulations over an entire geographic area. West Hollywood, for example, has 11 distinct preferential permit districts[8]. This framework enables West Hollywood to establish a coherent set of regulations that respond to the specific parking problems within each area, as well as coordinate parking management among the 11 districts.

Finally, at $6 per permit per year Glendale is on the low end of its geographic peers charging for permits. While Burbank and Pasadena gives their permits away for free, other peer

[6] Links to each city's preferential parking program can be found in Appendix D.

[7] Resident and non-resident parking demand is measured by a standard parking occupancy survey that also notes license plates of parked vehicles. The license plate data can be cross-referenced with DMV records available by request to public agencies in order to determine the percent of parked cars that belong to residents and non-residents.

[8] See Appendix E for more detail.

cities charge between $7.50 and $35 per permit. As mentioned earlier, preferential permit fees are being revaluated and debated by a number of cities. California's statutory language related to residential permit programs dictates that cities set permit fees based on a cost recovery model directly related to administrative costs. Initial research of California cities reveals, however, that very few have established a permit fee structure that accurately reflects the cost of running a preferential parking program.

Most California cities established their permit programs decades ago, and fees, if any, were based on basic criteria (such as printing costs) that did not fully account for other program costs, which include the application costs[9], costs of doing the initial parking study, putting up signs, and managing and enforcing the permit zone. As the number of preferential parking districts has grown and the number of permits allocated has likewise increased, so have the costs of administering citywide preferential parking programs, yet most cities have not raised their permit fees accordingly. Furthermore, if cities do decide to raise their fees, the rationale supporting such fee increases is often arbitrary. For example, many cities have based their fees simply on what neighboring cities have done and not on the actual costs of their program.

Some cities have begun to document the fact that their permit programs are actually costing them more than they charge for permits and have taken steps to revise their permit fees. In general, these cities have begun to fully account for the myriad of costs associated with running a preferential permit program, such as staff time to evaluate district formation, process permit applications, manage the program; costs associated with materials, signage, and maintenance of districts; and the costs related to enforcement of the regulations. In San Francisco, for example, permit fees were recently increased from $76 to $96 per permit per year to cover the $8.4 million it costs to run their preferential permit program (59 employees plus 35 parking control officers). Hermosa Beach has only one preferential district and charges $40 per permit, but the revenue its program generates (roughly $400,000 per year) "…does not meet our administrative needs."[10] Consequently, Hermosa Beach is in the process of revaluating its preferential program, especially its fee structure.

Discussed below are case studies of cities with "innovative" programs outline some different approaches to permit fees, such as graduated fees based on the number purchased, proximity to convenient locations, and charging significantly higher rates for non-resident permit purchases.

[9] None of the case studies identified here explicitly charge for the district formation process not for permit applications.

[10] Phone interview with Hermosa Beach staff. April 28, 2010.

Figure 1. Summary of PPD Peer Research

Location	City Context	Preferential Parking District Program Requirements/Guidelines/Fees	Notable Practices
Geographic Peers			
Glendale, CA	Numerous small-scale, preferential districts.	1) Petition signed by 75% of residents living in adjacent dwelling units. 2) Requires parking study - demonstrated problem of spillover parking with at least 25% of cars being non-resident. 3) $6 annual fee per permit. 4) Unlimited number of permits per household/neighborhood. 5) 2 free guest permits per car in household	
Burbank, CA	n/a	1) Requires 2/3 concurrence from residents in adjacent dwelling units. Must contact at least 80% of residents. 2) Requires parking study with minimum 70% of cars being non-resident. 3) Up to 3 permits per dwelling unit. Additional 2 permits if prove that more than 3 vehicles registered to address (5 max). 4) Limits to areas where number of residential dwelling units does not exceed the number of available on-street parking spaces. 5) Permits are free. Expire every 3 years. 6) Up to 25% of permits can be allocated for commuter or non-resident vehicles. $50 per permit. 7) Businesses: 3 permits per calendar year.	- Links number of permits to units and on-street spaces. - Permit maximums. - Allows for limited purchases by non-residents.
Culver City, CA	PPDs on 59 street segments	1) Petition signed by 75% of residents living in adjacent dwelling units. 2) Parking study that finds more than 75% occupancy and a minimum of 25% occupancy by non-resident motor vehicles. 3) Before implementation, at 2/3 of households must have bought a permit. 4) Maximum of two annual permits may be purchased by residents of each household. 5) $16 per permit. Valid for 1 year. 6) Permit holders may also obtain 24 one-day guest permits, at a time, at no additional cost. Three day guest-parking permits are also available for free.	- Permit maximums. - 2/3 must purchase before implementation.
Pasadena, CA	8 preferential districts	1) Requires 2/3 concurrence from residents in adjacent dwelling units to begin study. 2) Requires simple majority to move forward with district. 3) Requires parking study with minimum 70% occupancy and minimum 40% of cars being non-resident. 4) Up to 3 free, non-transferable permits shall be issued to any dwelling unit or merchant annually. 5) 3 free guest permits to every residential dwelling unit. No guest permits shall be issued to merchants. 6) Permits issued shall not exceed 150% of available on-street parking spaces. 7) Warning citations issued for first two weeks following implementation. 8) Temporary overnight parking exemption (TOPE): Residents wanting to temporarily park their vehicles on the street between the hours of 2 a.m. to 6 a.m. must purchase an overnight parking exemption ($3 per night + $1 fee for online purchase). Maximum of 10 consecutive nights. Residents can also apply for an annual long-term overnight parking permit at a cost of $63 per calendar year. Valid only in front of a residential use.	- Permit maximums. - Permits issued shall not exceed 150% of available on-street parking spaces. - Temporary overnight parking permit program.

Location	City Context	Preferential Parking District Program Requirements/Guidelines/Fees	Notable Practices
Long Beach, CA	n/a	1) Requires 2/3 concurrence from residents in adjacent dwelling units. 2) Requires parking study with minimum 75% occupancy and minimum 50% of cars being non-resident. 3) Prorated fees: January - March $32.00; April - June $24.00; July - September $16.00; October - December $8.00. 4) Maximum of 3 permits per household. One $15 guest permit may also be issued per household.	- Permit maximums.
Santa Monica, CA	5 preferential districts	1) 2/3 resident approval, comprising not less than 50 percent of the developed frontage of the area. 2) Requires parking study with minimum 50% of cars being non-resident. 3) 1 residential permit for each vehicle; 2 visitor permits per household; Up to 25 temporary, (date specific) one-day guest permits. 4) $7.50 or $15 per permit per year (guest permits included).	- Permit maximums.
Santa Ana, CA	n/a	1) Petition signed by residents living in two-thirds of the dwelling units. 2) Requires parking study. 3) Single-family: 3 permits max w/ 75 guest permits per year per home. Multi-family: 1 permit max. per and no guest permits. 4) $35.47 per permit per year. Expire every 2 years.	- Permit maximums.
Cities with "Innovative" Practices			
West Hollywood, CA	11 preferential districts covering vast majority of the city	1) Petition signed by majority of residents or businesses. 2) Requires parking demand study. 3) Graduated fee structure: $15.00 for 1, $35.00 for 2, $70.00 for 3, $120.00 for 4 4) 2 guest permits per address; $22.00 for 1, $44.00 for 2 5) Commercial permits are sold on a limited basis to businesses located within districts 1, 2 and 3. Permits are prorated: $120.00 for 1st quarter; $80.00 if purchased in the second month, $40.00 if purchased in the third month.	- Permit maximums. - Graduated fee structure based on number of permits purchased. - Allows for commuter purchases of permit. - Simple majority threshold for resident approval.
Santa Cruz, CA	6 preferential districts	1) Requires simple majority of resident approval. 2) Requires on-street parking occupancies of 75% or more. 3) Up to 3 annual permits, plus 2 annual guest permits per household (guests must use within 3 blocks). 4) Permits cost $25 each. Residents may also purchase up to 30 daily permits per household per year for $2 each. 5) Some districts have seasonal enforcement. 6) Sells commuter permits in PPD areas where daytime parking demand is less than 75%. Commuter permits are only valid on a designated block face. Employees or business owners who work adjacent to the permit area are eligible.	- Permit maximums. - Low approval, high occupancy thresholds. - Allows for commuter and non-resident purchases. - Enforcement varies by season. - Simple majority threshold for resident approval.

Location	City Context	Preferential Parking District Program Requirements/Guidelines/Fees	Notable Practices
Del Mar, CA	One district adjacent to the beach	1) Pay-and-display parking meter zones in combination with permit program. 2) High hourly rate and long meter hours to generate parking turnover. 3) $700 annual permit fee. Available to both residents and non-residents. 4) Some of parking revenue used to fund community improvements.	- Permit holders exempt from meters. - High parking rates to better manage high demand for spaces and generate turnover. - Allows employee and non-resident purchases of permit. - Revenue funds district improvements.
Hermosa Beach, CA	One district adjacent to the beach and main commercial area	1) 1 permit per vehicle plus 1 transferable guest permit. Each permit is $40 per year. 2) Resident permit holders may park at any yellow posted meter without paying the meter. 3) Block-Your-Own-Driveway (BYOD) Street Parking Permit Program enables residents (or their designees) to legally park in front of driveway. 4) Employees working in the affected area can purchase 1 employee parking permit for $143 per permit per year.	- 1 permit limit. - Allows for employee and non-resident purchases of permit. - Block your Driveway permit allows for more efficient use of on-street parking. - Permit holders exempt from yellow meters.
Tucson, AZ	14 neighborhoods plus University of Arizona campus	1) 75% approval resident approval. 2) Residential: Available for properties not exceeding four (4) units. Number of permits based on a property's street frontage. Parking is allowed only on the block face of the address. Permits are $2.50 annual/per permit. One visitor pass with their residential parking permit – do not expire. 3) Apartment: Five or more residential units. Limited to parking on the apartment's property frontage only. Does not guarantee a parking space. Permits are $25.00 annually. 4) University of Arizona: Non-resident program hours are from 8:00 am to 5:00pm, M-F. Issued on an annual basis, August 1st to July 31st. 4 zones: Zone 1: $450.00; Zone 2: $350.00; Zone 3: $250.00; Zone 4: $150.00. Limited number for businesses/employees: $325.00 annually. 5) Permit holder authorized to park at parking meter located in the designated area for which the residential parking permit is issued. 6) ParkWise program overseen by a 14-member citizen advisory commission.	- # of permits based on property street frontage. - Allows for non-resident and employee purchases, with fees that vary by proximity to U of A campus. - Permit holders exempt from meters in their respective district.

Location	City Context	Preferential Parking District Program Requirements/Guidelines/Fees	Notable Practices
Toronto, ON	Established program in 1960's to deal will spillover from commercial and entertainment districts and for neighborhoods with little off-street parking	1) Requires petition of minimum of 25% of the residences to begin study. Simple majority to pass. 2) Hours and days of PPD restrictions varying by zone and by street. 3) Permits are limited to number of spaces available. Waitlist system is used when all permits for an area have been sold. 4) 6/12 Month Resident Permits: Either one 6 or 12 month permit per household. Permit fees vary according to a priority system based on need: • No access to on-site parking for resident's first vehicle: $11.95/month • No access to on-site parking for resident's second and any subsequent vehicles: $29.88/month • Resident does have access to on-site parking (permit is for convenience): $41.84/month 5) Temporary (resident/visitor): Weekly on-street parking within the limits of a permit parking street or area provided space is available. 6) Surplus revenues fund the majority of the City's "green" environmental programs and the "Clean and Beautiful City" initiative.	- Restrictions vary by zone. - Linked to number of actual parking spaces. Waiting list. - Permits limited to 1 per household. - Allocated by priority w/ fees based on parking availability. - Permit revenue used to fund "green" programs.

Cities with "Innovative" PPD Practices

This section provides a summary of practices of other cities that have implemented one or more changes to how they addressed PPD management compared to conventional practices. These programs are not perfect, but at a minimum they offer at least one "innovative" approach in the realm of policy or legislative frameworks, enforcement protocols, supporting technologies, day-to-day administration, or customer service. Some of the strategies implemented in these cities may not be appropriate for Glendale, but may still offer lessons to consider and spur creative thinking in developing any potential improvements to how Glendale manages preferential parking. The profiled communities include: West Hollywood, CA; Santa Cruz, CA; Hermosa Beach, CA; City of Del Mar, CA; Tucson, AZ; and Toronto, Ontario.

West Hollywood, CA

As a relatively dense urban village that is a major employment and entertainment destination within Southern California, West Hollywood experiences problems with parking spillover and limited parking supply. In response, the City of West Hollywood has implemented several innovative programs to increase parking availability, including adjusting their residential parking permit program to better address the needs of residents while making more efficient use of on-street parking supply.

As a major entertainment destination, West Hollywood experiences a surge of visitors to certain portions of the city during the evening and weekend hours. To address the need for varying hours of enforcement depending on location, West Hollywood varies timing restrictions by district. In some of the existing 11 PPD districts[11], parking is restricted at night but not during the day (like those areas near Sunset Boulevard) and in other areas parking is restricted to permit holders during the day but not at night. This may be useful to Glendale in establishing an entertainment district with reduced parking requirements; avoiding spillover into the adjacent neighborhoods.

West Hollywood has also implemented a graduated pricing structure for annual permits. Permit fees are $15 for the first vehicle, $35 for two vehicles, $70 for three vehicles and $120 for four vehicles with a limit of four permits. Annual guest passes are available for $22, with a limit of two passes per address per year.

In addition to residential parking permits, the City of West Hollywood sells, on a limited basis, commercial permits to non-residents in some areas where daytime parking is often available. Commercial permits are available to contractors who may be doing work in the area, as well as for other employment uses that do not conflict with peak parking times. Commercial permits are sold on a quarterly basis and are pro-rated. The cost is $120 for the entire 3 months, $80 if purchased during the second month of the quarter, and $40 if purchased during the final month of the quarter.

Santa Cruz, CA

Santa Cruz has established a PPD program for residents that also allows commuters to purchase permits to park in residential neighborhoods during the day. In March 2003, the City Council approved the sale of Commuter Permits in all of the PPD districts (Chapter 10.42 of the Municipal Code). Commuter Permits are available for purchase for employees and business owners who work adjacent to a permit area. Proof of employment or ownership is required.

The Commuter Permit allows permit holders to park on a designated block face only in a residential program area and exempts commuter vehicles from the daytime 2-hour parking restrictions, however, commuter vehicles are not allowed to park overnight. Commuter Permits are only available for streets that have residential parking occupancies of less than 75 percent

[11] See Appendix E for a map of West Hollywood's PPDs.

during daytime restricted parking hours and the number of non-resident permits that may be sold per block face is limited to the number of available parking spaces based on historical demand patterns. Commuter permits are sold quarterly on a calendar year basis (an example would be a permit good only for October to December). The cost per quarter is $60. Sales are prorated on the 1st and 15th for the remaining portion of the quarter. They can be purchased for the current calendar quarter, or for all quarters in the current calendar year.

Hermosa Beach, CA

As a popular beach town with relatively high density and limited off-street parking, the City of Hermosa Beach has implemented a PPD program with several innovative aspects. Like the City of Santa Cruz, Hermosa Beach allows employees who work within the boundaries of the PPD area to purchase parking permits. Employee permits are sold on an annual basis at a cost of $143 which is more than triple the cost of an annual residential permit ($40). Employees are required to show a paycheck stub as proof of employment in the permit area.

Secondly, resident permit holders may park at any “yellow meter” (meters with the heads painted yellow) without paying the meter and may park in one-hour time limited zones for an unlimited time within the boundaries of the PPD area. By combining its meter areas with a permit program, Hermosa Beach can not only benefit a broader class of users, but also maximize the use of on-street spaces while raising additional parking revenue.

Lastly, the city has established a Block-Your-Own-Driveway (BYOD) Street Parking Permit Program enabling residents to legally park in front of their own driveway. According to the California Vehicle Code driveway parking is illegal (Section 22500), however, Section 22507.2 states that:

> “Notwithstanding subdivision (e) of Section 225000 [Prohibited Stopping, Standing, or Parking], a local authority may, by ordinance, authorize the owner or lessee of property to park a vehicle in front of the owner’s or lessee’s private driveway when the vehicle displays a permit issued pursuant to the ordinance authorizing such parking. The local authority may charge a nonrefundable fee to defray the costs of issuing and administering the permits. A local ordinance adopted pursuant to this section may not authorize parking on a sidewalk in violation of subdivision (f) of Section 225000.” (Amended Ch. 45, Stats. 1985. Effective January 1, 1986.)

Hermosa Beach adopted an ordinance (Municipal Code Section 10.32.80, Permit Parking-Private Driveway) that states:

> “Parking in front of a private driveway shall be allowed only when a vehicle has prominently displayed on the front dashboard a valid parking permit which includes the address of the owner or a lessee of the private property, at which the vehicle is to be parked. Permits are valid only at the address contained upon the permit, and is effective while the holder owns or leases the property for which the permit is issued. Permits may be revoked without notice or hearing if it is determined that parking authorized by the permit create traffic safely or other public health and safety problems. Vehicle creating a traffic hazard may be towed pursuant to Section 10.12.150 (B). Permit does not authorize parking on a sidewalk in violation of California Vehicle Code Section 22500(f).”

The permits are a placard that is hung on a vehicles’ rearview mirror and are driveway-specific but transferable among vehicles so they can be used by the building owners or residents, visitors, and/or contractors. There is a limit of one BYOD permit per household/driveway. The length of the vehicle(s) using the permit cannot extend beyond the width of the driveway at any point, measured as the length between the ‘curb slopes’ at street level and permit holders must follow

all other street parking restriction (i.e., street cleaning) and cannot block driveways for multiple space garages or driveways that front on narrow alleys.

City of Del Mar

The City of Del Mar has established pay-and-display parking meter zones on several streets adjacent to their popular beach area. Given the popularity of access to the beach and the high demand for parking, the City established relatively high parking rates of $3 per hour. The City also charges for parking every day of the year, including Sundays and holidays, from 9 a.m. to 8 p.m. These high rates ensure that there is sufficient parking turnover in this area, as well as significant parking revenue generation for the City. The revenue component is particularly important in Del Mar because a share of the parking meter revenues is used to help pay for services that benefit visitors to the beach, such as lifeguards and beach clean-up

Given these rates, the City wanted to offer an alternative for all-day commuters and local residents. For example, a commuter wishing to park his or her car in a Del Mar meter zone for the typical work week would have to pay approximately $6,240 per year ($3 per hour x 8 hours per day x 5 days per week x 52 weeks = $6,240). In addition, a resident wishing to park their car in this area for the entire week over the course of a year would have to pay more than $12,000 annually ($3 per hour x 11 revenue hours x 365 days = $12,045). Therefore, in combination with these meter zones, the City of Del Mar also offers a pre-paid $700 permit which anyone (not just residents) can buy. The permit is a hanging placard that allows unlimited parking at any meter or pay machine. The permit also allows parking in the primary commercial area's time-limit zones for double the posted limit. For example, 3 free hours in the 90-minute zone and 4 free hours in the 2-hour zone.

As a result of combining its meter zones with a preferential parking program the City of Del Mar is now able to ensure that is valuable on-street spaces are efficiently utilized throughout the day. Del Mar's $700 annual fee is one of the highest permit fees in the case studies listed in this analysis, but when viewed in the context of the hourly meter rates the permit fee is significantly cheaper than what hourly parkers would pay. Finally, the revenue generated by the meters and permit fees allows Del Mar to not only cover its administrative costs, but also pay for various parking district improvements.

Tucson, AZ

The City of Tucson implemented a PPD program in 1983 to help manage the impacts of non-resident parking in residential areas. The program has since grown to include programs in more than 14 neighborhoods. Tucson has implemented several regulations regarding the issuance of residential permits which are unique. First, the number of residential permits issued is based on a property's street frontage and parking is allowed only on the block face of the address for which the permit is issued. Given the low permit cost of $2.50 per permit per year, the frontage regulations help ensure that there is a relationship between parking supply and demand as without them the number of permits sold would likely be greater than the number of available on-street parking spaces given the nominal cost of permits.

Second, residents also receive one visitor pass with their residential parking permit. The visitors pass is a plastic card, and may to be moved from guest vehicle to guest vehicle as needed. When parking with a visitor pass, visitors may only park within the same block of the residence for which it is issued.

Third, Tucson also has a Meter Exemption Program, which allows residents to purchase a permit to park for free at specific meters adjacent to their residence. These meters are clearly marked for the program and only specific addresses qualify. The cost of this program is $2.50 annually / per

permit. No visitor passes are issued with the meter program. These meters can also be purchased for special neighborhood events.

For buildings with five or more residential units there is an Apartment Program. Permit holders are limited to parking on the apartment's property frontage only and a permit does not guarantee a parking space. Permits are $25 per year. Lastly, certain areas are eligible for the Meter Exemption Permit Program which enables residents to purchase a permit to park at specific meters adjacent to their home without having to pay for the meter. Eligible meters are clearly marked for the program and the cost is $2.50 per permit per year.

Finally, for the area near the University of Arizona, the City of Tucson has developed a Non-Resident Parking Permit program. University staff and students are eligible to purchase a non-resident permit which enables them to park in residential areas adjacent to campus from 8:00 a.m. to 5:00 p.m., Monday through Friday. The area around campus has been divided into four zones which have varying permit fees. Zone 1 is located closest to the campus and thus the cost for a Zone 1 permits is the highest, where as Zone 4 is located farthest from the campus and has the lowest cost permit.

Permits are for use on particular block faces only, and there are a limited number of permits available for purchase that is linked to the actual on-street parking available. The City of Tucson has an online perking permit zone map which shows how many spaces are available for purchase on each block face in each zone.

Permits are issued on an annual basis from August 1st to July 31st and on a semester basis from August to December and January to July. The costs per year and per semester are listed below:

- Zone 1: $450 and $300
- Zone 2: $350 and $250
- Zone 3: $250 and $200
- Zone 4: $150 and $100

For an additional $100 per year, hanging permits may be purchased which are transferable between vehicles.

Toronto, Ontario

The City of Toronto has operated an on-street PPD program, in one form or another, since the 1960s. The program was initiated to preserve on-street parking spaces for local residents in areas where residents own cars but have no access to off-street parking facilities, or in “areas of interest” where non-residential demand threatens to overwhelm on-street parking in surrounding neighborhoods. In most cases this demand is the result of tourism, area entertainment and services, or the proximity of transportation nodes.

Toronto’s PPD program is designed to promote flexibility in responding to the different parking demand pattern’s in different neighborhoods and changing needs over time, allowing significant differences in the hours of operation within each permit area to better address the unique needs of different permit areas. Within Toronto, there are currently 54 unique combinations of permit parking operating hours, which were developed over time and in response to specific concerns (e.g., long-term commuter parking). These hours of operation are clearly posted on street signs at regular intervals on each street where permit parking is in effect. Permit regulations may be established for specific streets, instead of larger areas. In street-specific locations, residents are only granted permits for parking on their block of residence. In the larger permitted areas, residents may park on any licensed street within their permit area, but are not guaranteed a parking space on their specific street.

Unlike PPD programs that operate on a cost-recovery model, Toronto generates surplus program funds that are placed in general Transportation Services Department accounts that fund the majority of the City's "green" environmental programs and the "Clean and Beautiful City" initiative. Toronto has also implemented a fee structure which varies based on the criteria described below:

- First vehicle for residents with no access to on-site parking: $11.95/month
- Second and subsequent vehicles for residents with no access to on-site parking: $29.88/month
- All vehicles for residents with access to on-site parking: $41.84/month

Lastly, Toronto has established a waitlist for on-street parking since the total number of permits for each street or district is limited to the actual number of regulated on-street spaces available. When no spaces remain within a district or on a street, no more permits are issued and a "waitlist" is created for the remaining qualified permit applicants, with waitlists varying by neighborhood contingent on parking demand. In cases where a waitlist exists, residents with multiple permits may be forced to surrender a permit to those on the waitlist with none. This process begins with the person holding the highest number of permits, although revocation of multiple permits is rare, it is an additional incentive for households to limit the number of permits they purchase in areas with high on-street parking demand.

Concepts for Further Evaluation

Based on the review of peer and best practice programs, the following concepts should be considered as Glendale seeks to revise its PPD program. In general, changes to the program could be implemented in one of two ways: 1) "grandfather" the current permit regulations in with existing permit holders and implement new regulations over time as resident turnover occurs in the district; or 2) implement new permit regulations for all permit holders at the annual permit renewal time.

Outlined below is a brief summary of the concepts that the City of Glendale should evaluate further.

1. **Create true parking districts rather than single street/block zones.** Districts should be required to be large enough that permit holder could reasonably expect to find a parking space within a zone, even if they cannot find parking on their own block or street. Geographic districts will also allow Glendale to take a more holistic approach to parking management and enable the City to manage supply and demand not just for a single street, but for an entire area based on that area's specific parking challenges. Such revisions will also streamline PPD district formation and make it easier for the public to understand the various parking regulations.

   See case studies: West Hollywood, Toronto, Tucson, Pasadena, Santa Monica.

2. **Link the number of permits issued to the actual parking supply in a given district**. This revision to the PPD program would require an inventory of parking spaces, as well as housing units, as part of the initial district formation process. This revision would also require that a cap be placed on the number of permits issued per unit. For example, if the inventory finds that there are 1,000 parking spaces in a district and 500 housing units, the City could limit the number of permits issued to 150 percent of available parking spaces (1,500 spaces), or 3 permits per unit.

   If the City wants to make permits available to non-residents or commuters it could also set aside a certain percentage of permits for non-residents to maximize the utilization of parking during the day (for example, 20 percent or 300 non-resident permits). Finally, if a cap is instituted and demand still exceeds supply, the City could also create a waitlist system, in which those with multiple permits could be forced to give up (or sell) one or more of their permits to those on the waiting list. The percentages and restrictiveness of the cap could vary among districts, but ultimately these revisions would ensure that the parking supply in a district is managed more effectively.

   See case studies: Toronto, Burbank, Pasadena.

3. **Reduce the threshold for petition approval to 2/3 of residents and increase the non-resident vehicle occupancy threshold.** Glendale has the highest threshold for resident approval among all of the case studies reviewed. As mentioned earlier, this can prove problematic to district formation, especially in residential areas with a significant amount of renters. Gathering signatures in multi-unit buildings and the higher turnover associated with renter populations makes meeting this threshold very difficult. A two-thirds threshold can balance the need for strong resident support and a functional formation process.

   The City of Glendale's current PBD regulations require that only 25 percent of inventoried vehicles in a proposed district be non-resident to trigger a PBD. Along with Culver City, Glendale had the lowest occupancy threshold for non-resident vehicles. Such a low threshold makes it difficult to assess whether there is an actual spillover problem in the area or whether the mismatch in parking supply and demand is more a function of too

many resident vehicles parked on the street. The case studies reveal that a more common non-resident threshold is in the 40-50 percent range, with Burbank having the highest threshold at 75 percent. In short, Glendale should consider raising its non-resident vehicle occupancy threshold to at least 40 percent, which would balance the need for adequate resident parking and ensuring that the source of parking difficulties in a neighborhood can in fact be attributed to non-resident spillover.

See case studies: Long Beach, Santa Monica, Santa Ana, Burbank.

4. **Consider selling daytime permits for non-residents and/or using pay stations to sell excess parking during daytime hours.** As discussed earlier, when residents leave a PPD for the day during the week, many on-streets spaces become available. However, if a PPD only allows for 2-hour non-resident parking, non-residents will be discouraged from parking and it is likely that those on-street spaces will not be fully utilized. Such 2-hour restrictions also promote the parking "shuffle," which increases local traffic.

   In order to maximize on-street efficiencies, the City of Glendale should consider combining its PPD program with meter zones on residential streets. Multi-space pay stations would enable non-residents to utilize these spaces during the day, while residential permit holders would be exempt from the meter regulations. Ideally, revenues collected from pay stations and enforcement would be allocated to a neighborhood improvement district, benefitting the area in which they are collected. Furthermore, a higher hourly rate would help to ensure parking turnover. Finally, the City could also consider allocating a certain percentage of the revenue generated by the meters to fund a variety of improvements in the district.

   Another way to maximize parking efficiencies during the day would be to sell permits to commuters or employees working near a PBD. As mentioned above, the City could allocate a certain percentage of its "capped" parking permits to non-residents to ensure they can find a parking space near their place of employment. Many of the case studies presented in this memo, such as West Hollywood, Santa Cruz and Tucson, already sell permits to non-residents. However, the non-resident permits are usually sold at a much higher rate ($120 - $700 per permit) than resident permits. One potential application for these non-resident permits would be for the schools that are near the South Brand Boulevard corridor. Schools are often major parking generators because they typically do not provide enough off-street parking for faculty. Given that the normal school day ends in the mid-afternoon, school faculty might be a good test case for the sale of non-resident permits because there is a smaller chance that their use of on-street parking spaces would conflict with residents returning home from work in the evening.

   Finally, another way to prevent on-street parking overlap between non-resident and residents would be to restrict non-resident permit hours. For example, non-resident permits could only be valid from 9:30 a.m. to 4:30 p.m. The obvious downside to such a restriction is that many commuters would likely need to stay past 4:30 p.m. However, if Glendale were to combine its PBDs with pay station meter zones a non-resident that needs to stay past 4:30 p.m. would be able to purchase extra on-street parking time.

   See case studies: Hermosa Beach, Del Mar, Tucson, Toronto, Santa Cruz, West Hollywood.

5. **Permit fees should account for the true cost of running a permit program.** As discussed earlier, most PPD programs in California are not cost neutral, as is allowed by the California Vehicle Code. The permit fees in the programs do not fully account for all of the costs associated with administering a permit program, including: the cost of the initial

parking survey, processing both district formation petitions and permit applications, signage and maintenance of facilities, and enforcement.

Given these costs and the likelihood that the demand for PPDs will increase, Glendale's should consider substantially raising its $6 permit fee. Other fee revisions to consider include a tiered pricing structure with higher prices for each additional permit sold, particularly if the number of permits per household is not constrained. The tiered structure could also take into account proximity to popular destinations.

See case studies: West Hollywood, Del Mar, Tucson, Toronto.

In addition to the concepts outlined above, the City of Glendale Traffic and Parking Commission Subcommittee met in December of 2009 to discuss a number of issues related to parking. Some of these issues – raising permit fees and lowering the resident petition threshold – have been covered thoroughly in this memo, while others will be discussed in brief below. Finally, City staff has raised a few additional points of interest, which are also touched on below.

1. **Formation of a residential permit program <u>without</u> a resident petition approval process.** The peer review done for this analysis reveals that the vast majority of cities with a residential permit program have a resident petition approval process. The two peer cities that do not have an approval process (Del Mar and Hermosa Beach) are unique in that they are self-contained districts in an area proximate to a major attraction (beach), as opposed to a citywide program.

   The primary reason for the resident approval process is to confirm that there is indeed a spillover problem in a residential neighborhood and that there is neighborhood support for the fee program. Because different neighborhoods may have different levels of tolerance for fee based permit parking, it is recommended that the residential program begin with a permit drive. The City and the Transportation Commission may assist in developing boundaries for the district, and could initiate the process, but fee districts should not be implemented without neighborhood support.

2. **Creation of Transportation Management District.** A Transportation Management District may employ multiple tools to manage parking, and may also have parking requirements that differ from the rest of the City. Establishing a parking district is recommended on a case by case basis where multiple approaches would benefit an area and where revenue generated within a district might be spent entirely or in part on projects within the district. Formation of a Transportation Management District would allow Glendale to take a more holistic approach to parking management and enable the City to manage supply and demand not just for a single street, but for an entire area based on that area's specific parking challenges.

   There are a number of cities that Glendale could look to for best practices regarding district formation, including Old Pasadena, Santa Monica, and Boulder. Finally, the City of Tucson's ParkWise program is overseen by a 14-member citizen advisory committee. All of these examples are worthy of further discussion.

3. **Removal of 1-year time limit for district expansion.** As discussed above, the City of Glendale Municipal Code currently includes a provision that if residents want to expand an existing preferential parking district, they must do so within one year of the date from when the original district was formed. It appears that this provision is unique to the City of Glendale. Many of the peer cities allow for district revisions and expansions according to their existing approval process (i.e. a petition is required for the targeted expansion area), but they do not have a time restriction.

In the City of Pasadena, for example, residents can expand an existing district at any time with a simple majority of resident approval, but the City also reserves the right to expand an existing district without resident approval to mitigate impacts of changes to the right-of-way or if there is "verifiable and measurable parking intrusion in that adjacent area from the source which impacted the established preferential permit parking district." Removal of Glendale's restrictive provision from the parking code should be considered, as it limits the ability of both residents and City staff to adapt to changing parking conditions within an area.

4. **Stakeholder reaction to "innovative" parking practices.** The majority of the parking policies implemented in most cities were developed decades ago, when the social, economic, and environmental framework for planning were entirely different. Revisions to those policies have been supported by more and more empirical research, but change is still hard to come by as parking policy has become one of the most divisive issues in transportation planning. This peer review did not undertake an in-depth review of the political environments in which these peer cities implemented their "innovative" permit programs. However, a few general observations can be made.

   First, these cities implemented a new or innovative practice because there was a flaw in their existing system. For example, the city could have had too many permits for too few spaces or permit fees that did not cover costs of the program and did nothing to discourage the purchase of permits. Whatever the deficiency, each city's PPD had a problem and the current parking management practices were not working optimally. Second, it is clear that despite any resistance these changes might have generated they were all still implemented. Third, the effectiveness of these policies can be measured to a limited extent by the fact the policy is still in place. Fourth, there is precedence that cities can take steps to limit community opposition. Emerging practice with the formation of parking benefit districts has shown that the use of data-driven studies, the presentation of clear data to the public and decision-makers, consistent and conspicuous regulations, and the use of parking revenue to fund local transportation and streetscape improvements can significantly mitigate or even eliminate community opposition. The cities of San Diego, Old Pasadena, and Redwood City are all relevant examples.

   In short, it is likely that all of these "innovative" peer cities faced some form of opposition from one or more community stakeholders when trying to reform their parking practices. In the end, however, they chose to craft a new approach based on what has worked elsewhere but also tailored it to local conditions.

5. **Business impacts of "innovative" PPD practices.** This peer review did not focus on the economic impacts of these parking policies in the respective cities. In fact, there is limited empirical research on this topic because it is challenging to isolate the impacts of such parking policies on individual businesses. However, many cities, and especially the downtowns, that have implemented parking benefit districts have had made significant economic improvement. The classic example is Old Pasadena, which was once a thriving commercial corridor, but sank into decline by the 1970s. The overhaul of its parking policies and the creation of a parking benefit district in the early 1990s is seen as a crucial factor in this area's economic revival. In short, these districts have holistic approaches to parking management that are financially supported by the parking revenue in the area, and have proven to be very successful.

   In the South Brand area, one of the anticipated challenges to a new PPD is resistance from businesses wishing to use residential streets for overflow employee parking. The employer and employee surveys currently being conducted in the South Brand area will provide the City with the data it needs to determine the exact breadth and depth of the

area's parking challenges. Once those basic data points have been established, it will be much easier to develop a unified set of parking revisions that will not only meet the needs of employers and their employees, but also the parking demands of South Brand customers and nearby residents.