May 18, 2009

Seattle City Councilmember Jan Drago, Chair, Transportation Committee
Seattle City Council
PO Box 34025
Seattle WA 98124-4025

RE: Restricted Parking Zone (RPZ) Legislation

Dear Councilmember Drago,

The Commission appreciates the opportunity to provide you and the City Council with comments regarding the Restricted Parking Zone Legislation. Last year, we provided SDOT with feedback about this program and would like to commend them for their thoughtful review. There is a definite need to reexamine the current policy regarding RPZs, and the process used by SDOT staff for doing so has been thorough, inclusive, and comprehensive.

The public right of way is an extremely valuable resource for all residents of the city. Restricted Parking Zones are created to help manage this resource for the people who live in a specific area and the Commission supports the proposed changes to consider non-residential access, improve the permitting and tracking process, and increase enforcement. The Commission also supports undertaking a more comprehensive approach that evaluates and manages parking supply and demand throughout the city as a means to implement Comprehensive Plan goals and policies to increase use of transit, bicycling and walking, and reduce dependency on automobiles.

The Commission has developed specific comments regarding the draft recommendations and the issues raised by Council Central Staff in their May 4, 2009 memo to the Transportation Committee.

Business Permit Pilot Program
The proposed pilot program seems to be a reasonable way to monitor changes in parking demand in proximity to light rail stations. The Commission agrees with changes to the RPZ program that will support local neighborhood businesses, but is concerned that the proposed program might have unintended consequences, particularly in industrial zones. In addition, we recognize that station areas in southeast are likely to see increased demand for on-street parking when light rail service begins, which could adversely impact the supply of parking for local businesses. The quarter mile boundary for the proposed pilot program is not likely to deter ‘hide and ride’ parking and might need to be expanded.

We support SDOT’s work to accommodate these businesses and review the program after two years. At the same time, Commissioners are still concerned that the proposed program
might not accommodate employees who work in these locations but cannot rely on transit to get to their jobs. Rather than evaluating whether to expand a similar program into other RPZs, the Commission suggests using this and other data to inform a city-wide parking strategy. While the Commission strongly supports City policies to encourage use of transit and moderate use of automobiles, we recognize that transit service and connections need much more improvement in order to achieve these goals. We need a citywide, long-term strategy for parking that evolves as transit service improves.

**Number of Permits per Household**
The Commission supports limiting the number of permits provided per household from the current program that has no limit to the number of permits a household can obtain. SDOT’s new monitoring system will allow for tracking and analysis of how many permits households actually receive, and is a step in the right direction toward eliminating an imbalance between the number of permits issued and amount of parking spaces available in the RPZ. The Commission supports Central Staff’s recommendation to have the Executive report back in two years after further consideration of a progressive fee structure.

Another consideration would be to regulate the number of permits issued to each individual rather than to each household. For example, three unrelated adults in one household who each want to get an RPZ permit are likely to have different parking needs than one individual who receives permits for three cars. At the same time, there might be very few circumstances where either household type exists. The ability to monitor and evaluate the number of permits issued to a household or individual will help determine appropriate limits to the allowable number of permits.

We also support SDOT’s recommendation to require that vehicles actually have to be registered to the person applying for the permit and at the same address where the RPZ is located. The Commission suggests that as SDOT develops the new on-line permitting process, they make it clear to applicants what documentation they will need prior to applying for a permit.

**Guest Permits**
The Commission strongly supports SDOT’s efforts to reduce permit fraud through changes to the design and issuance of guest permits. We also suggest that the logistics of a biennial guest permit might be easier to administer and manage than single-use day permits.

**Increase Thresholds for Forming an RPZ**
The Commission supports revising current standards to improve enforcement and allow for non-residents to park in and around neighborhood business districts. We agree that the minimum size for an RPZ should be established for effective enforcement.

We support changing the threshold requirements to accommodate an increased level of non-resident parking before an RPZ could be established. We also support Council Central Staff’s suggestion to fund SDOT to monitor and report on how these changes have impacted parking in the neighborhood and whether or not they warrant further revision.

**Replacing Resident Petition with SDOT Administrative Process**
The Commission supports proposed changes that would consider other parking management tools before establishing an RPZ and that allow for broader public outreach that includes all community members in addition to residents. The Commission also supports the elimination of the petition process, which does not necessarily allow all community members to have an equal voice in determining the use of this public parking resource. We also support Council Central Staff’s suggestions to expand the proposed legislation to allow this process to be used to modify and eliminate RPZs.
We would like Council to consider establishing a program to evaluate a coordinated review of parking city-wide. It appears that there are too many overlapping issues and competing interests related to parking for isolated programs like RPZs to adequately respond to all of them. Seattle needs a comprehensive evaluation of parking demand before an effective strategy to manage that demand can be developed. The Commission strongly encourages Council to consider funding a concerted, city-wide evaluation of parking that would result in a Parking Master Plan. SDOT’s new permitting system, coupled with increased enforcement are a step in the right direction for gathering the data necessary to evaluate parking supply and demand and develop a city-wide strategy, but more will need to be done.

The Commission is happy to continue providing our comments and recommendations. We look forward to working with you and the Transportation Committee throughout this year and in the future to continue monitoring parking programs throughout the city. If you have any other questions about our comments, please don’t hesitate to contact Barbara Wilson at (206) 684-0431.

Linda Amato, Chair

Seattle Planning Commission

cc: Seattle City Council
Mayor Greg Nickels
Tim Ceis, Mike Mann, Nathan Torgelson, Mayor’s Office
Grace Crunican, Tracy Krawczyk, Barbara Gray, Mary Catherine Snyder, Margo Polly, SDOT
Diane Sagimura, Alan Justad, Ray Gastil, DPD
Brian Surrat, OED
Norm Schwab, Council Central Staff

Enclosed: Seattle Planning Commission June 26, 2008 Memorandum to Grace Crunican, Director, SDOT re: SPC comments on draft recommendations of the Residential Parking Zone policy review

Record of Disclosure and Recusal:
• Commissioner Marty Kaplan disclosed that he is currently a candidate for City Council; a member of the Queen Anne Community Council, Land Use and Planning committees that have studied the proposed RPZ; and a principal of Martin Henry Kaplan Architects, that designs projects in locations that have RPZs.
• Commissioner Josh Brower disclosed that his firm, Tupper Mack Brower, represents clients who own and/or develop properties that might be impacted by the proposed program.
• Commissioner Catherine Benotto disclosed that her firm, Weber Thompson, designs projects in locations that have RPZs.
• Commissioner David Cutler disclosed that his firm, GGLO, designs projects for property owners whose interests may be impacted by the RPZ program.
• Commissioner Kevin McDonald disclosed that he lives in an RPZ zone but does not have an RPZ permit.

Note for the Record
• Commissioner Leslie Miller is on a medical leave of absence from the Commission.
MEMORANDUM

To: Grace Crunican, Director, Seattle Department of Transportation
From: Tony To, Chair, Seattle Planning Commission
Re: SPC comments on draft recommendations of the Residential Parking Zone policy review

June 26, 2008

Ms. Crunican,

The Planning Commission appreciates the opportunity to provide you with comments regarding the Seattle Department of Transportation’s (SDOT) draft recommendations for the Residential Parking Zone (RPZ) policy review.

The Commission would first like to commend SDOT for taking a thoughtful approach in performing this review. There is a definite need to reexamine current policy regarding RPZs, and the process used by SDOT staff for doing so appears to be thorough, inclusive, and comprehensive.

We recognize that curb space on public streets is a limited resource. In most cases that resource is equally available to all. An RPZ designation creates an exclusive and dedicated use of that resource for residents when there is a compelling reason to do so. Traditionally, RPZ’s have been created to try and help ease parking congestion in residential neighborhoods to discourage long-term parking by non-residents. RPZ’s have also been created in places where parking congestion is caused by being near a business district with limited parking, and/or is caused by parking generated by visitors or employees of a hospital, school, sporting or cultural event facility, or factory.

The Commission has developed some specific comments regarding the draft recommendations for the Residential Parking Zone policy review:

**RPZ’s should be consistent with City’s Comprehensive Plan policies**

We view parking, both on private and public property, to be one element in a broader land use and transportation context. In implementing the goals found in Seattle’s Comprehensive Plan, parking represents a vital aspect of the City’s effort to encourage density in certain areas while increasing use of transit, bicycling and walking citywide and encouraging decreasing dependency on automobiles. With this in mind, the Commission believes Seattle should continue working to develop a more comprehensive Parking Management Strategy. RPZs can be an important tool in an overall strategy in solving neighborhood and business conflicts.
Fairly Price RPZ’s

We support increasing the cost of permits to reflect the true cost of such a program, including staff time, public meetings, monitoring and enforcing, processing and mailing, etc., and set the price high enough to cover this cost while balancing the potential negative and regressive impacts of a drastic fee increase.

Strengthen Eligibility Requirements

We support limiting the number of permits provided per household citywide. The potential need for parking of the up to eight unrelated people allowed to live together in one home in Seattle should be balanced with efforts to encourage reduced automobile ownership and use in favor of increased transit use, especially in denser areas with transit availability. We encourage SDOT to explore ways to better ensure that the number of permits issued in an RPZ better correlate with the amount of curbside parking spaces available within the RPZ.

Reduce Fraud Potential and Increase Enforcement

We strongly support enhanced efforts to reduce permit fraud. These should be aimed at discouraging people from forging and reselling permits or from otherwise abusing the system at the expense of their neighbors who are legitimately using this system. It is worth exploring the best practices used by other cities to determine the best course for ensuring RPZ’s are used for their intended purpose. Concern also exists about enforcement. We support hiring more Parking Enforcement Officers (PEOs) to enforce use of permits.

Revisit Process for Creating and Maintaining RPZ’s

We have concern regarding the creation process. Zones need to be created with adequate input and support by neighborhoods and with adequate study by SDOT. The City should consider a sunset provision for each zone. Prior to the date of the sunset, SDOT and the neighborhood could analyze the zone to determine if it is successful in achieving its objectives and to ensure residents want to continue its existence.

Please don’t hesitate to contact our Executive Director, Barbara Wilson, at (206) 684-0431 if you have any further questions about our comments. And once again, thank you for the opportunity to comment on this important initiative.

Cc:
Mayor Greg Nickels
Seattle City Council
Tim Ceis, Mike Mann, Nathan Torgelson, Mayor’s Office
Diane Sugimura, Alan Justad, John Skelton, DPD
Susan Shannon, Brian Surrat, OED
Tracy Krawczyk, Barbara Gray, Mary Catherine Snyder, Jennifer Hayes, SDOT
Norm Schwab, Council Central Staff