



November 5, 2017

The Parking Standards for New Development Project Task Force
City Hall
301 King Street
Alexandria, VA 22314

Re: Updating the Commercial Parking Standards for New Development Projects

Dear Members of the Parking Standards for New Development Projects Task Force:

On behalf of the Environmental Policy Commission (EPC), I'm writing to share our comments on the draft recommendations for updating Alexandria's commercial parking standards for new development projects. I would like to thank Transportation and Environmental Services (T&ES) staff and the Task Force for providing the draft parking study report for discussion at our October 16th monthly meeting. We appreciate the opportunity to provide input to the Task Force in advance of finalizing its recommendations.

The EPC strongly supports the draft recommendations aimed at reducing or "right-sizing" commercial parking in new development projects based on the study of existing parking needs, as well as anticipated reductions in parking demand based on mass transit improvements anticipated along the Beaugard and Duke Street corridors.

EPC supports the Task Force recommendations to:

- simplify zoning map into two zones, designating lower minimum parking ratio requirements in areas with enhanced transit access (includes current anticipated transit systems),
- lower the minimum parking ratios,
- add maximum parking ratios,
- combine retail types into one retail category to the extent the new requirements can meet anticipated need and enable flexibility in changing types of retail uses in a space,
- exempt small businesses below a certain square footage from providing required parking, and
- develop a process to allow for shared parking between businesses.

These recommendations are more flexible and reduce obstacles for businesses inclined to reduce parking. Reduced parking is consistent with the City's environmental goals as outlined in the Environmental Action Plan (EAP), as part of a strategy to "create a holistic city transportation system that puts the health, mobility, and accessibility of "people first" by implementing development and transportation programs and projects consistent with the

following level of precedence: pedestrians, bicyclists, public transportation, shared motor vehicles and private motor vehicles.”

While the EPC supports the Task Force’s draft recommendations, we have the following comments, questions, and proposed additions:

- **Three to Five Year Evaluation Cycle:** The EPC recommends that the final recommendations include a proposal for the parking standards to be reviewed every three to five years. The next update should not take another 50 years. Given rapid changes in mobility from the growing popularity of shared riding services to the emergence of self-driving cars, it is likely that parking standards will deserve more frequent reconsideration to ensure that they are properly attuned to local needs.
- **Regular Collection and Analysis of Parking Data:** To support the more regular re-evaluation of these parking standards, the EPC encourages the Task Force to request that Staff collect data annually to monitor how people are using parking to ensure that the policy is working as intended. Sensors and computer vision technology now make collecting such data much easier and cost effective. For example, the City should track regularly how many people are using shared-ride services and for what use cases. As more people use shared ride services, the need for parking may decrease over time. It is the EPC’s observation that debates around parking are too often influenced by personal anecdotal evidence rather than empirical data. The City can help educate the public and right-size its parking requirements by more regularly collecting and reporting parking data.
- **Lower maximum ratios.** The EPC recommends that the Task Force consider further lowering the proposed maximums and, in the event there is a reasonable need for more parking, developers would be required to submit an exemption request. Given that the idea of a maximum is new for the City, it would seem logical to the EPC for it to be set low enough that some developers would be expected to seek an exemption. Having businesses justify the need for additional parking would be an opportunity for the City to negotiate development that ties the parking standards to environmental and transportation plans and policies. The exemption process would allow an opportunity to collect data about under what circumstances developers request to build more parking.
- **Lower minimum ratios.** While the EPC supports the proposed lower minimum ratios, we would be interested in understanding why the Task Force rejected lower or even the total elimination of the minimum parking requirement. Eliminating or lowering even further minimum ratios would support the growing adoption of alternative modes of transportation, and alleviate the administrative burden on staff and businesses by eliminating the need to apply for parking reduction exemptions.
- **Demand-related policies.** The EPC was disappointed to learn that the Task Force was only asked to review parking ratios and not more comprehensively how to meet evolving parking needs in the City. The EPC would encourage the Task Force to highlight the limitation of its mandate and recommend that Staff pursue a follow-on effort that examines dynamic pricing and other policies to address demand rather than just focusing on supply through parking minimum and maximum ratios. Dynamic pricing would enable the City to match parking demand with current and anticipated parking supply.

Finally, the EPC believes that updating the City's parking standards should also be an opportunity to encourage alternate modes of transportation and advance the City's sustainability goals. The draft recommendations reflect the current state of transportation and parking in the City, but should contemplate more directly what kind of transportation and parking resources we want to have in the City in the future. This means not only reacting to the market, but putting in place policies to shape it. The EPC welcomes future collaboration with the City and Task Force to define what kind of parking and transportation options we want to have in the future.

Thank you for your consideration.



Jim Kapsis
Chair
Environmental Policy Commission

cc: Alexandria Environmental Policy Commission
Alexandria Transportation Commission
Yon Lambert, Director, T&ES
Katy North, Principal Planner, T&ES