



MEMORANDUM - DT REDLANDS PARKING STUDY
RESPONSE TO TRANSPORTATION & PARKING COMMISSIONER COMMENTS

PROJECT #37-009592.00
 707 Wilshire Blvd, Suite 3650
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DATE: May 22, 2023
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 FROM: Weckstein, Jeff
 PROJECT NAME: Downtown Redlands Parking Study
 PROJECT NUMBER: 37-009592.00

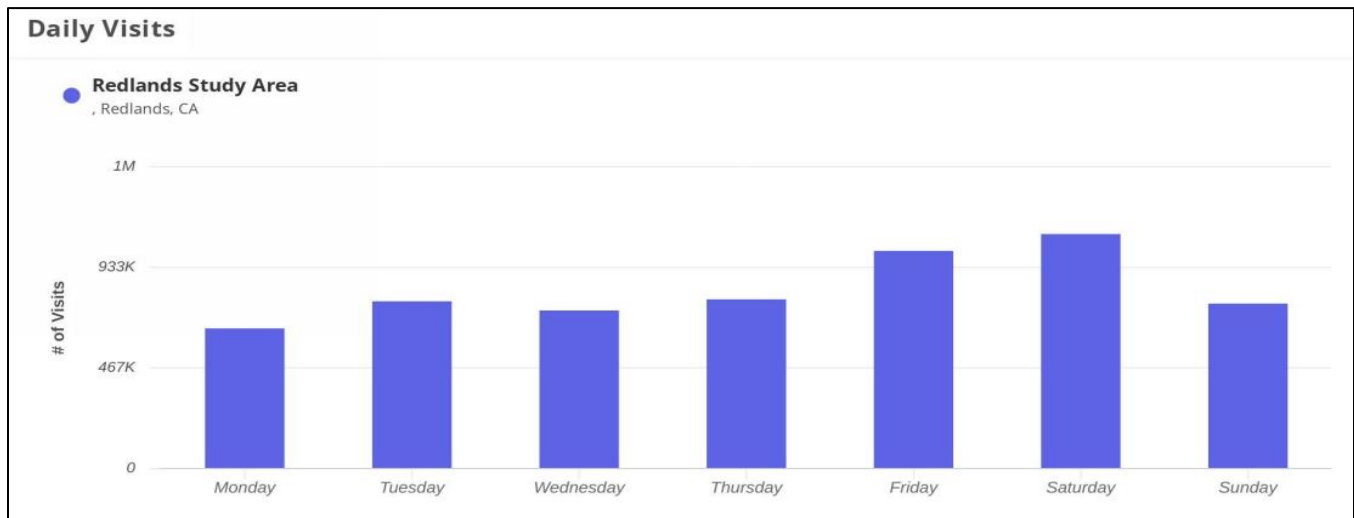
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Walker has reviewed the comments provided by the City’s Traffic and Parking Commission commissioners on the Downtown Redlands Parking Study (Walker Consultants, April 27, 2023), and offers the following responses:

Comment KM-1: *As I noted at the previous meeting, the report’s “Summary of Existing Conditions Key Findings” is sourced on an extraordinarily slim data set. What industry/professional standards or other peer reviewed study methodologies support this data collection strategy and analysis as reflective of overall conditions?*

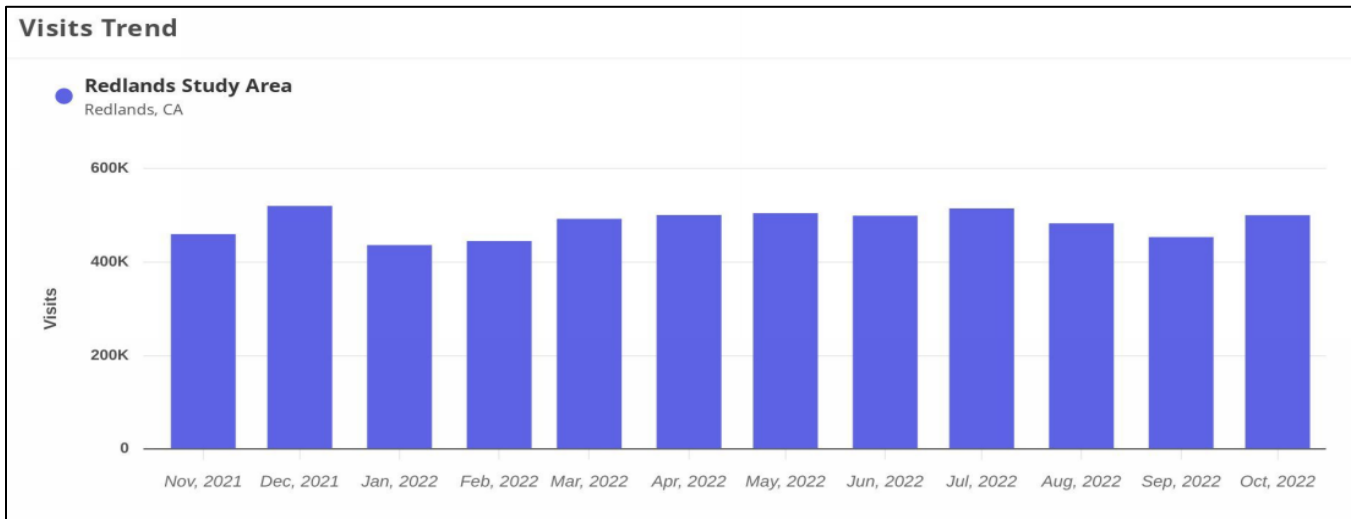
Response KM-1: It is typical in the parking industry to collect data on one weekday and one weekend day for a parking study. Walker has completed municipal parking studies for thousands of jurisdictions over its 57-year history and has a deep body of knowledge regarding typical trends in downtowns. In studies where we have collected additional data at the request of the client, the additional data collected tends to be similar and does not add a significant amount of value to the findings and recommendations.

In preparing for the data collection for the Downtown Redlands study, Walker consulted with City staff as to typical conditions that they desired to capture, and design to. In addition, Walker utilized visit and visit trend data provided by placer.ai, shown below. Thursday is a typical weekday, and Saturday was clearly the busiest weekend day.



Source: Placer.ai

Similarly, looking at the monthly trend, November 2021 was not the busiest or least busy month, and coming out of the Covid-19 pandemic and the Omicron variant in the winter of 2021, it would be expected for most months of 2022 to have more visits downtown than November 2021.



Source: Placer.ai

The key finding from the study is that convenient parking is difficult to find in some areas, at least some of the time. If anything, this problem is understated in the month of November, and may become even more of an issue in other months. This would not affect the recommendations substantially:

- The City is already advised to continuously pursue opportunities to expand the public parking area. There is such ample supply of underutilized private parking, that additional demand might simply increase the price the City would pay to lease private spaces, but it would not alter the core strategy or the cost-effectiveness of this method relative to other options for expanding the public supply.
- If observations revealed higher demand, the paid parking pilot area could also have been expanded slightly. However, this is just a pilot program, and it may be easier to err on the side of having too small a paid parking area for the pilot.
- One strength of the report's recommendations is that they are flexible and demand-responsive. If parking demand increases, the City can increase its efforts to expand the supply of underutilized parking made available to the public and can expand the paid parking area. If demand decreases, the City can end any shared-use agreements deemed unnecessary and reduce the paid parking area if streets do not have sufficient demand to justify paid parking. The strategies are meant to address high parking demand (according to observations and anticipation of future development) but can easily be scaled back if demand turns out to be lower than planned for.

Comment KM-2: *There is no narrative, methodology, or explanation as to how the conditions from one weekday and one weekend in late November is both reflective of, or can be extrapolated to, the overall usage patterns/demand during the other days of week or times of the year. How does Walker support a Thursday in November as being reflective of the conditions throughout the year such as a similar Thursday in February, May, or August?*

Response KM-2: See response to comment KM-1. Additional narrative and methodology explaining the data collection will be incorporated into the final version of the report.

Comment KM-3: *All of the study references, graphics, and examples come from data collected from the late 90s and early 2000s. In the case study cities referenced, what are the current use conditions and data for the past seven years (2015-2022)?*

Response KM-3: Cities do not always publish or even track the results of their policies. Academic studies focused on a policy solution are often spread across cities rather than repeated over time in the same city. We attempted to obtain more recent data and followed up with city staff members regarding a few of the case study references:

- San Clemente shared parking program – in their 2018 Downtown Parking Study, staff recommended continuing the existing lease program and considering new opportunities to lease underutilized spaces (suggesting the continued success of the program). Walker contacted City staff for an update and received the following response: “The program continues to be very valuable for us. We currently have agreements with 7 different private lots, so each now has posted “Public Parking” signage. We are interested in expanding this program to also include night or weekend only lots – which would help especially with the downtown dinner rush. We have recently started to get pushback on the lease rate and some requests to increase that. Those will be evaluated on case-by-case basis.”
- Old Town Pasadena PBD – Walker contacted the City’s Economic Development Director who agreed to research and provide an update to the sales tax revenue comparison between the PBD and other commercial areas; a response is still pending.

Comment KM-4: *Given significant changes in shopping patterns (reference closing retail shops/malls), general societal changes (online shopping/social media society), and growing concerns with homelessness/safety concerns within downtown areas, how does Walker factor in these significant economic/social/environmental changes into the downtown parking models referenced in the report? How have these factors impacted Santa Monica and Pasadena parking districts as referenced?*

Response KM-4: Closing retail locations and the rise of online shopping in general leads to a greater share of restaurant use relative to retail which increases parking demand and thus the importance of parking management. Parking management that ensures availability can also help keep retail businesses in the downtown: a member of Redlands’ business community shared that the lack of convenient parking harms retail more than restaurant uses, since retail customers may be more likely to go elsewhere if convenient parking is not available, whereas restaurant visitors are often meeting others and less likely to change their plans. Visitors who are willing to pay a few dollars for a good parking space also tend to be the ones who are most likely to spend money in the area, so it is important to make sure a variety of parking options are available.

Improving safety downtown was one of the key recommendations in this report, under Strategy 4 – to improve the pedestrian environment. Santa Monica’s downtown does not have a parking benefit district, but there is a business improvement district. BID activities (including “Clean and Safe” activities) are funded through property-based assessments, rather than parking revenues. Pasadena’s PBD uses parking revenue to fund Safe, Clean, and Homeless Outreach services. In addition to cleaning and beautification activities, their job description includes:

- Provide High Visibility & Presence
- Monitor Suspicious Activity

- Respond to Calls for Service
- Provide Safety Escorts
- Assist the Pasadena Police Department
- Conduct Homeless Wellness Checks

Guide hours are from 7am-midnight Sunday through Thursday and from 7am-3am Friday and Saturday.

Comment KM-5: *Is Walker aware of exemplar cities that utilized Strategies 1, 4, or 6 and why are they not included in the report. Where are the examples of cities that pursued options other than “Strategy 3” (reference pages 9 – 11)?*

Response KM-5: Strategy 1 (increase access to underutilized spaces through shared parking): San Clemente was used as an example because they are another mid-sized CA city with a formally established program. However, many other cities have individual agreements that allow public parking on one or two privately-owned lots. Additional case studies include:

- **Oak Park, IL:** The Village manages approximately 1,000 privately-owned parking spaces, encompassing approximately 30 different lots and owners.
- **Sacramento, CA:** As of spring 2015, the City has agreements with 21 privately owned parking facilities. Some are available to the public only on evenings and weekends. The City assumes all liability and enforcement responsibilities. Approximately 10,000 private spaces are publicly managed, resulting in approximately \$1 million annual revenue for the City.

For Strategy 4 (improve pedestrian environment): This is a common goal among downtowns and included in most parking plans, even if they do not always explicitly focus on improving routes that connect parking facilities with destination areas. One downtown that did was Pasadena. This was not included in the case studies as it was not a public initiative, but rather an initiative of their Playhouse District Association. The City of Pasadena assisted as a partner.

- 122 people in 25 teams participated in a “downtown Pasadena Walkabout” and their observations and recommendations were summarized in a report.
- 25 walking routes focused on getting into, around, and from various locations, including parking areas, and walkers provided comments on how to improve each route.

The City of Healdsburg also focuses on pedestrian improvements through its parking in-lieu fee, which can be used to spend money on sidewalks to help people more comfortably walk longer distances, as a way to reduce parking demand. An in-lieu fee is not an option in Redlands since minimum parking requirements are not legal within ½ mile of public transit, but this example shows how another city made the connection between pedestrian improvements and reduced parking demand.

Examples of cities using PBD revenue to fund pedestrian improvements:

- Austin, TX
- Boulder, CO
- Brookline Village, MA
- Old Pasadena, CA
- San Diego, CA

Regarding Strategy 6 (expand parking supply), we are not aware of examples of publicly run valet assist parking. The valet programs in our case study cities are privately run by establishments that wish to use their own facilities more efficiently and provide a better experience for their customers. However, in the case of Redlands, many businesses rely heavily on public parking, and it may be in their best interest to coordinate so that public facilities are used as efficiently as possible. The report recommends a feasibility study to further evaluate this option, especially as a flexible solution for event parking.

Comment KM-6: *General question as to Walker's business/consulting strategy or predisposed reporting outcomes bias. Of similar parking study reports issued by the company in the last five years, how many Walker issued reports did not recommend either a Transportation Management Ordinance or Transportation Improvement/Benefit District (reference pages 90 – 95)?*

Response KM-6: This report provides case study information related to a Transportation Management Ordinance but does not recommend this as a strategy for Redlands. Walker has performed hundreds of municipal parking studies over the past five years, the majority of which did not recommend either a Transportation Management Ordinance or Transportation Improvement/Benefit District.

Comment ERS-1: *page 5 - sustainable - Reconsider this word. There are modes that are not considered "sustainable" but they still reduce parking demand. Those modes should also be encouraged. Examples - ICE-powered motorcycles and scooters, golf carts, ICE-powered microcars.*

Response ERS-1: City staff has provided the following response to this comment: "Staff believes the focus should be on sustainable modes, consistent with the City's General Plan - scooters and other non-ICE powered modes are considered sustainable."

Comment ERS-2: *page 5 - study area - how was this determined?*

Response ERS-2: Walker worked with City staff to determine the appropriate study area for the project. Staff and Walker believe that these boundaries represented the best representation of downtown.

Comment ERS-3: *page 9 – Climate Action Plan. Please cite a reference*

Response ERS-3: This is part of the City's General Plan and is available on the City's web site. A reference to it in the document and a hyperlink in the digital version will be added.

Comment ERS-4: *page 11 – Sustainable – see previous comment.*

Response ERS-4: See response to comment ERS-1.

Comment ERS-5: *page 19 – a typical weekday and weekend day - There are multiple event centers in or near the study area. Events can be held day or night, any day of the week. One of these events can significantly impact on-street parking availability. This occurs often enough that it should not be considered an outlier, but rather a typical condition that should be addressed by this study.*

Did WC verify whether any special events were occurring during these two days?

Response ERS-5: Walker verified that there were no special events on the data collection days. Saturday November 19, 2022 was a farmer's market day. City staff does not consider an event day the design day for the parking system.

Comment ERS-6: *page 20* - ample availability overall - The term "ample availability" is misleading by your own description. Can a more accurate term be used?

Response ERS-6: Agreed. Text will be revised to say "while there were many empty parking spaces within the downtown area..."

Comment ERS-7: *page 21 - 1 p.m. How was all of this observed at one point in time?*

Response ERS-7: There were five data collectors in the field on the survey days. Counts were collected in an approximately 30 minute window starting at the hour noted.

Comment ERS-8: *page 22 - It would be very useful to also indicate which of these lots are private, non-public. This comment applies to all utilization maps in this report.*

Response ERS-8: Comment noted. This will be incorporated into the final report.

Comment ERS-9: *page 24 - Saturday at 9 a.m., 11 a.m. The new Farmers' Market significantly impacts parking demand and availability at these times. The conditions described in this report are no longer relevant. This requires additional study and an update to the report.*

Response ERS-9: Ed Hale's parking lot (61 spaces) opened up on Saturdays, but street parking taken away (127 spaces) for a net loss of 66 spaces on Saturday morning compared to when data collection occurred. The increase in Saturday demand/decrease in supply would not alter any of the key recommendations.

Comment ERS-10: *page 35 - Citrus Avenue garage remains and is. Why? It's a terrible parking garage. A new parking garage would meet seismic and accessibility requirements and provide an opportunity to extend retail and/or mixed-use all the way down Citrus.*

Response ERS-10: City staff provided the following response to Walker: "It is still a parking resource even though it does not meet current seismic standards. It would be nice to have a new structure on this site if funds were available." Walker agrees that it is still a parking resource, and while it could be demolished and incorporated into a new parking structure this would increase the cost per net new parking space considerably. Public investment in a structure is still an option in various forms, but it is a decision that should be weighed in the context of community-wide priorities and goals and other possible uses of public spending.

Comment ERS-11: *page 38 - Surveys. Some of this survey data should be mapped against time-of-day. I assume the interviewer documented that? TOD will be critical in coordinating shared parking arrangements with private owners.*

Response ERS-11: Time of day was recorded, and additional analyses could be conducted if desired. Responses to availability questions generally corresponded predictably with demand patterns observed through the quantitative data collection.

Comment ERS-12: *page 58 - 2017 Initial Downtown Parking Study. What became of this study? How was it used? Is a parking study meant to be reissued on a 5-6 year cycle?*

Response ERS-12: City staff provided the following response to this comment: “This was a survey/inventory completed by in-house city staff. It was not done by people with particular expertise in the area of parking management. There were several improvements done to city streets as a result of the study and a small city-owned lot was converted to a 56-space parking lot. There is no set time period for updating parking studies.

Comment ERS-13: *page 62 - actions that make alternative modes of transportation more attractive. I see inadequate bike racks and sharrows painted on the street. Bicyclists need actual infrastructure, not symbolic efforts.*

Response ERS-13: City staff noted that this is the type of recommendation they would like to see from the Commission. Walker notes that the section referenced is just summarizing existing objectives included in the Transit Villages Specific Plan. Walker could focus more on infrastructure separation in our recommendations if desired.

Comment ERS-14: *page 68 - Santa Monica, CA Is it confirmed that this approach is compliant with AB 2097?*

Response ERS-14: City staff provided the following response to this comment: “The purpose of the surveys from other cities was to help generate ideas on possible policies and programs, not to suggest that we necessary copy what other cities have done. This program in Santa Monica precedes AB2097 and likely does not comply. Walker further notes that this was included as relevant history/context for their city, not as a possible strategy option for Redlands.

Comment ERS-15: *page 68 - 1. Santa Monica, CA
2. Pasadena, CA
3. Cambridge, MA*

The only similarity between Redlands and these three cities is the population size. It is impossible to tell if these strategies would translate to Redlands. Are there examples successful parking strategies in edge cities with lower density, surrounded by even lower density, and with fewer alternative transportation options?

Response ERS-15: The case study cities are also similar in their goals from their General Plans. They may have been more successful in promoting sustainable transportation, partly as a result of well-aligned parking management efforts. Other examples exist but may be less comprehensive. For example, the report also mentions San Clemente in the context of shared parking.

Comment ERS-16: *page 69 - the state’s parking cash-out law. I hate to use too much blunt language, but this is a very dumb law. It is unknown, unenforceable, and unenforced. No one is monitoring its effectiveness.*

Response ERS-16: Comment noted.

Comment ERS-17: *page 70 - Unbundling Parking. Who pays liability insurance and property taxes on unbundled parking areas?*

Response ERS-17: The property owner would.

***Comment ERS-18:** page 70 - Impact Fees. Historically, how economically sustainable are impact fees? Maintenance and operations costs will come due in perpetuity. If impact fees vanish because a developer weasels out of it, who picks up the tab?*

Response ERS-18: City staff provided the following response to this comment: “Again, this is just an idea. Transportation Impact Fees are widely used by other cities and they are intended to make capital improvements to transportation infrastructure, not for maintenance.”

***Comment ERS-19:** page 72 - \$1.6 million, How is enforcement funded?*

Response ERS-19: City staff provided the following response to this comment: “That would be up to City Management through the City's budget process.”

***Comment ERS-20:** page 72 - meter replacement expenses. What were the costs of installing them in the first place?*

Response ERS-20: City staff provided the following response to this comment: “We do not have their cost numbers. There are many new technologies for implementing paid street parking that have varying costs.”

***Comment ERS-21:** page 73 - Parking Maximums. Do they have any issues with developments that are under-parked and creating excess demand on on-street and adjacent parking facilities?*

Response ERS-21: Walker has not interviewed their staff regarding the results of this policy, but their maximums may not be low enough to be binding (building to market demand could mean building less parking than the maximum allowable).

***Comment ERS-22:** page 73 - Parking and TDM Ordinance. Success with this approach is going to be dependent on density and availability of alternative transportation. Redlands has neither right now.*

Response ERS-22: This was not included among the recommendations for Redlands. It is just another parking-related policy from the case study city.

***Comment ERS-23:** page 75 – perception. Improving the perception of available parking is not a suitable solution. The improved perception will lead to increased demand that is both perceived and actual.*

Response ERS-23: Survey results demonstrate that some percentage of respondents feel that parking is inadequate in Downtown Redlands, while the data collection demonstrated thousands of empty parking spaces in the study area during periods of peak parking demand. Effective parking management and unlocking the private supply will improve the perception of parking availability by freeing up spaces for customers and visitors where they are needed most. However, actual availability will also improve in key areas, and for clarity, the phrase “and the perception...” can be removed.

***Comment ERS-24:** page 89 – Improve the Downtown Pedestrian Environment. This doesn't mention separation of pedestrian and auto routes.*

Response ERS-24: City staff provided the following response to this comment: “Difficult to implement within existing rights-of-way in downtown. Would require elimination of vehicle travel lanes as has been done in the downtowns of many large cities in recent years. This would be a good topic for the Commission to discuss and make recommendations on.”

Comment ERS-25: *page 89 – Encourage the Use of Sustainable Transportation Modes to Reduce Parking Demand. This doesn't mention separation of non-motorized and motorized routes.*

Response ERS-25: See response to comment ERS-24.

Comment ERS-26: *page 101 – parking enforcement position. Wouldn't this also require an experienced planner to oversee leasing, risk management, parking district management, and presumably a support staff?*

Response ERS-26: City staff provided the following response to this comment: “Depends on the extent of the duties. Could be limited to just enforcing time restrictions and paid parking areas but could also have other duties at the City's discretion. Another good area for the Commission to discuss and make recommendations on.” Walker notes that this recommendation and the parking benefit district recommendation can be updated to mention that allocation of staff time would be needed to support the recommendation.

Comment ERS-27: *page 103 – civilian. Is this position safe enough for a civilian?*

Response ERS-27: City staff provided the following response to this comment: “These positions are usually considered non-sworn positions under the Police Department. This would be up to the City to decide.” Walker further notes that civilians can write parking citations but cannot issue moving violations and are therefore less likely to interact with vehicle owners.

Comment ERS-28: *page 108 – : Action Steps. First action step should be to slow and separate traffic.*

Response ERS-28: City staff provided the following response to this comment: “This should be part of Commission discussions and recommendations.” Walker further notes that this could action be the result of “conduct outreach to determine how and where the community thinks safety could be improved” but this detailed outreach was not the primary focus of this study.

Comment ERS-29: *page 109 – : 8: Implementation Details. how are these implemented? District design standards?*

Response ERS-29: The implementation could start with revision of the Downtown District's design standards if needed, and would involve the City/stakeholders identifying specific locations for actions.

Comment ERS-30: *page 113 – : o large employers. The City is really the only large employer in the study area. This looks a lot like a benefit for City employees that won't really help reduce parking demand.*

Response ERS-30: Comment noted.

Comment ERS-31: *page 114 – : Create a Transportation Wallet Program. Resources should be focused on infrastructural improvements, not giveaway programs.*

Response ERS-31: City staff provided the following response to this comment: “These are good topics for Commission to discuss and make recommendations on.” Walker notes that this is more of a long-term option for one possible use of excess parking revenues, but it could be evaluated by the Commission/Parking Benefit District/community members in the context of other possible uses of funds when the time comes. Walker further notes that construction of additional structured parking, while an ‘asset,’ would provide a negative return on investment, and thus constitute a ‘giveaway’ program to motorists in its own right.