

Technical Assistance Tool: Parking Audit

Trenton, NJ – July 2012

To: Christian Martin, Trenton Downtown Association (TDA)

From: EPA Building Blocks Technical Assistance Team

Date: September 18, 2012

Re: Suggested Next Steps as Outcome of Technical Assistance

1. Key Issues Addressed during Technical Assistance Workshop

This Assistance Workshop primarily focused on the outcomes of the Parking Capacity Audit, which was completed just prior to the workshop, with a focus on on-street parking in the downtown. This Audit is designed to quantify the demand/ supply balance within public parking inventories during peak demand periods, and to thus inform assessments of parking availability, supply sufficiency, and parking-management opportunities to redistribute demand and make better use of existing resources.

The vast majority of the parking supply in downtown Trenton consists of off-street parking intended to accommodate daily, commuter parking. Most of this is employee parking — Trenton is not only the state capital, but is also the seat for Mercer County — that is not available to the public. State jobs, alone, bring tens of thousands of commuters downtown each day, with the State providing free parking for the portion of this population who drive. By contrast, the City of Trenton maintains and manages less than 800 on-street spaces to provide convenient, short-term parking to support the downtown retail/ commercial economy.

The most immediate issue indicated by the Audit findings was a consistent lack of availability among these on-street spaces. During the midday peak, very few blocks appear to offer consistent availability to arriving drivers. In fact, the majority of blocks within the downtown core had more parked cars than legal spaces during midday. Conditions were not much better during morning or afternoon surveys, and improved only slightly outside the downtown core (indicating minimal opportunity to redistribute demand out from the commercial core).

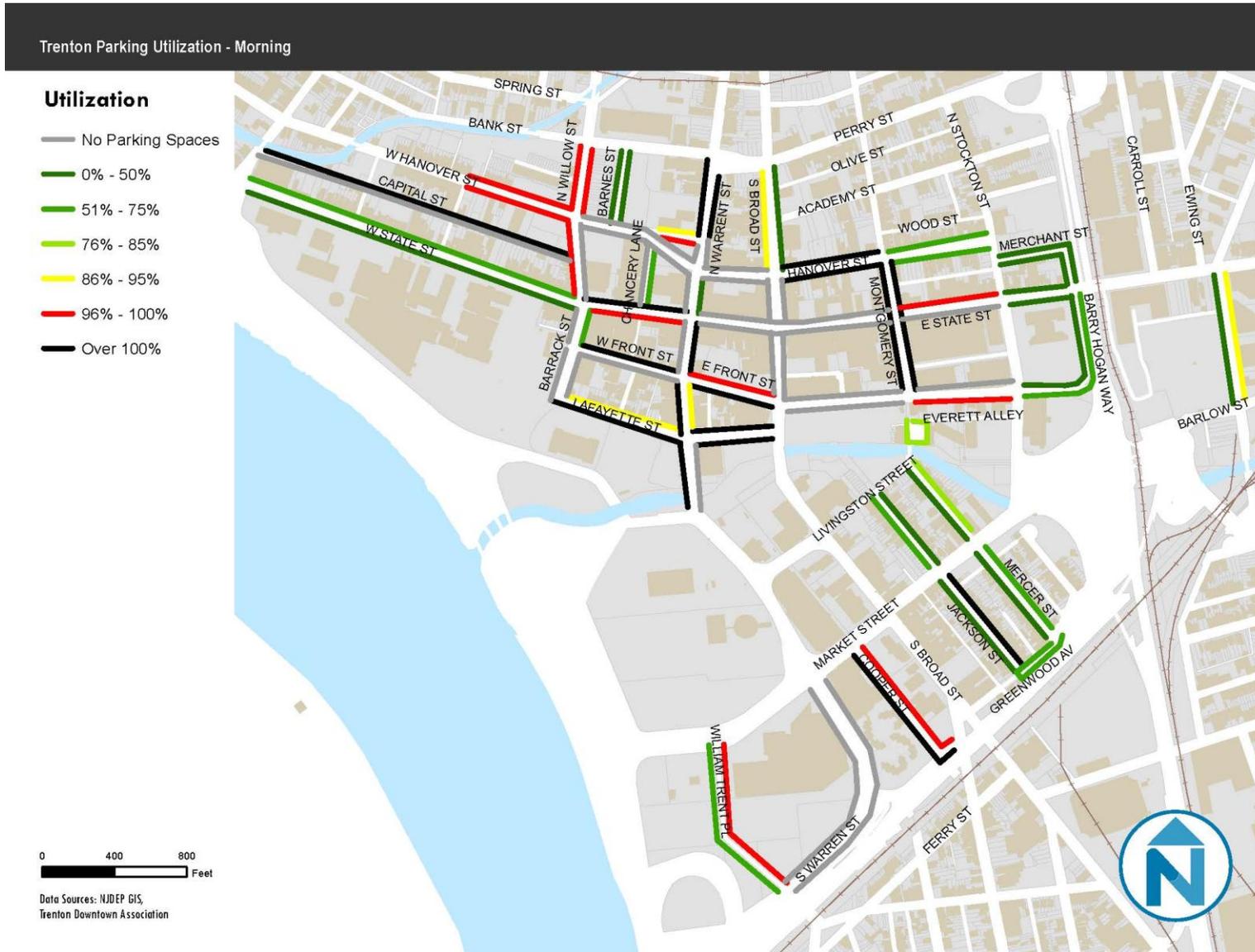
Addressing the capacity issues highlighted in the graphics below became the primary focus of the Assistance Workshop.

Figure 1 - Capacity Audit Survey Findings: Weekday Utilization Peaks

On-Street Parking	Supply	Weekday Utilization		
		Morning	Midday	Afternoon
	741	79.1%	96.0%	82.9%

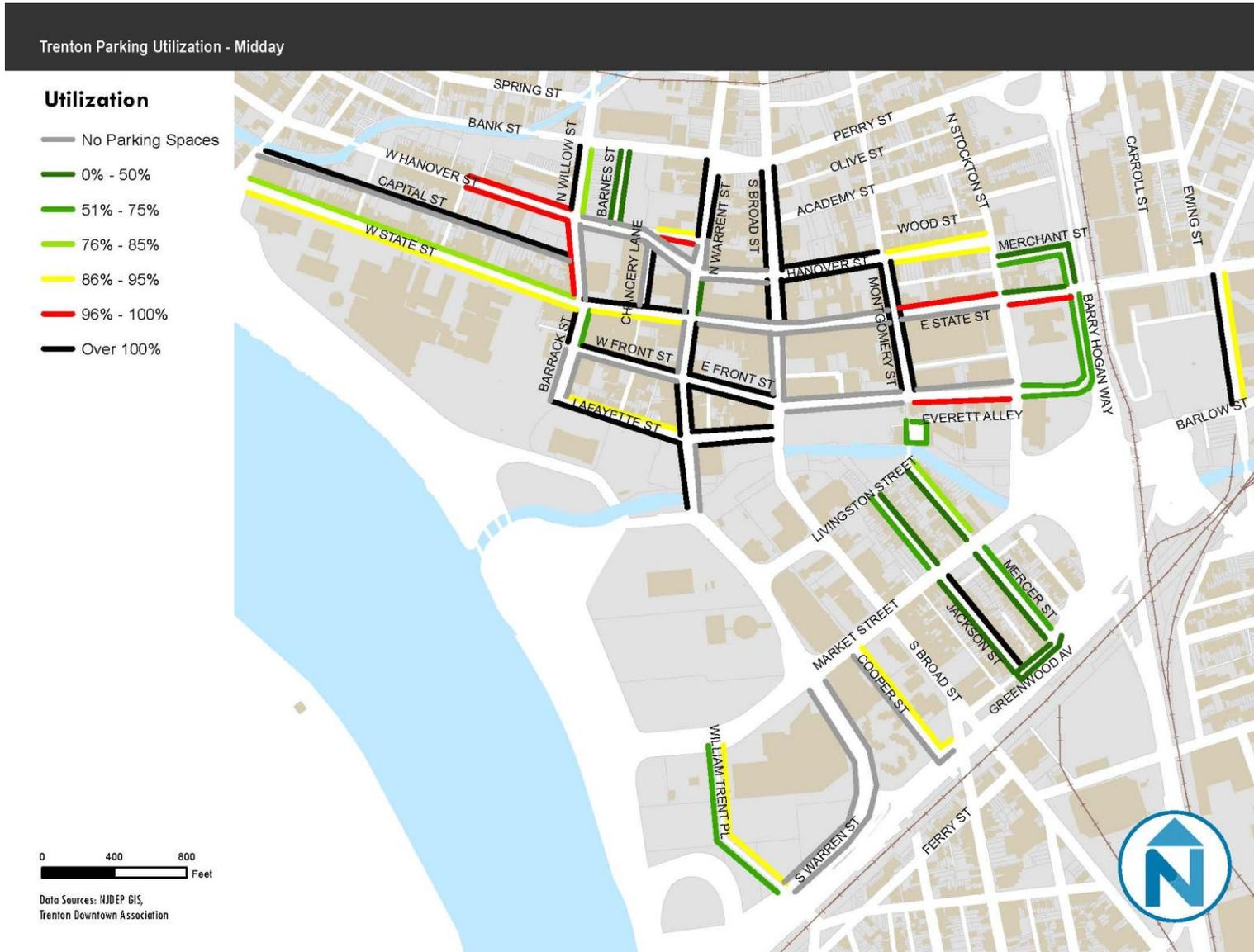
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Figure 2 - Capacity Audit Survey Findings: Weekday Morning Utilization Patterns



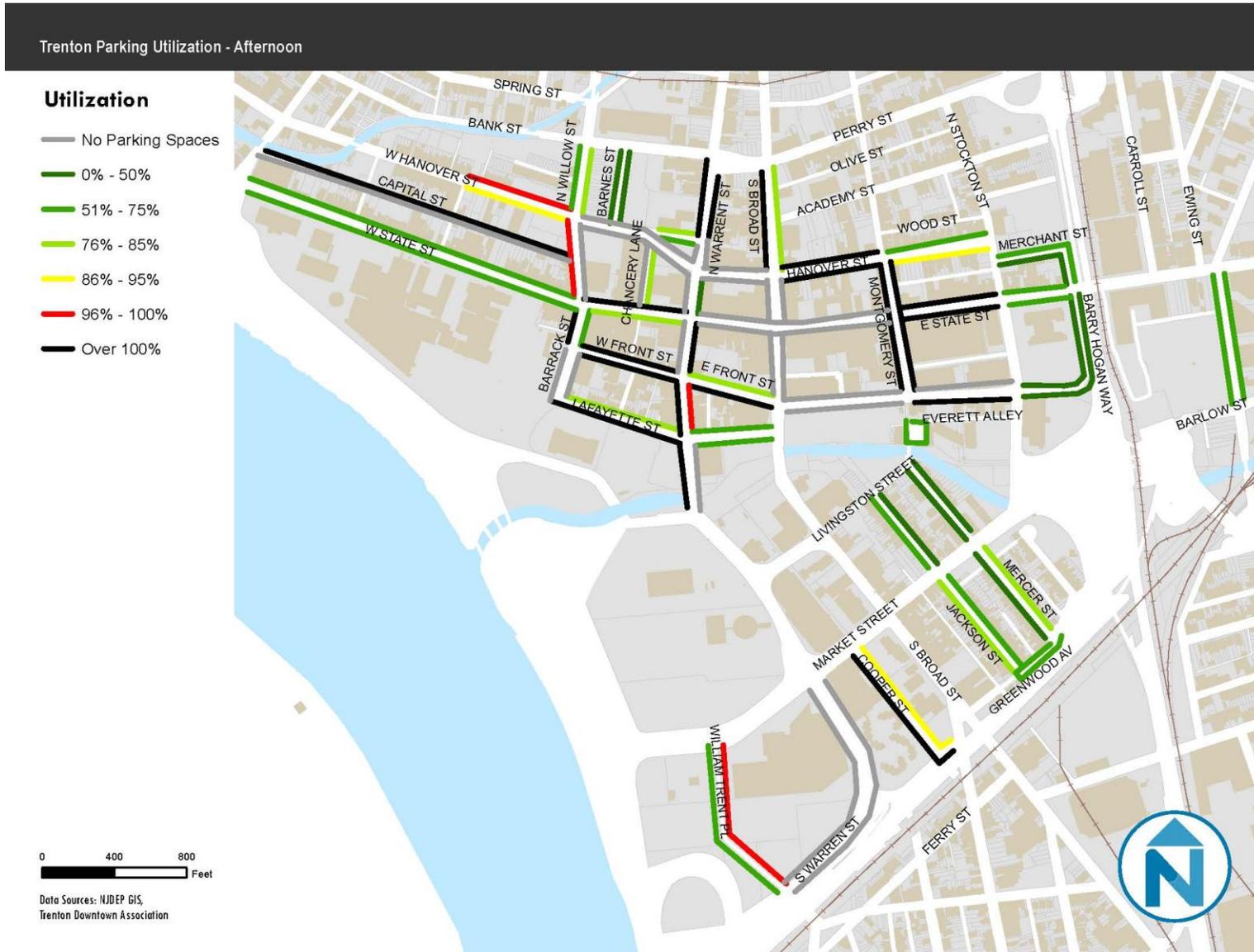
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Figure 3 - Capacity Audit Survey Findings: Weekday Midday Utilization Patterns



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Figure 4 - Capacity Audit Survey Findings: Weekday Afternoon Utilization Patterns



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2. Findings Overview

Following is a summary of findings arising from the Assistance Workshop, in assessing the Capacity Audit results and their implications for parking management challenges and opportunities for improving on-street parking availability in downtown Trenton.

Impact of Handicapped-Parking Permits

Before the Workshop, the TDA received an email from the owner of a commercial business in downtown that contained the following observations:

"I stepped out of my office a few moments ago to take the mail to the mail box. There are ten metered parking spots directly in front of our building ... 8 out of the 10 spots are occupied by vehicles that are displaying handicap tags... These are typically the same cars parking here every day and most of the occupants disappear into the State House, the Taxation Building and other (State of New Jersey) office buildings in the immediate vicinity... These vehicles are hindering those of us who conduct our businesses on this block. Visitors trying to get to our offices are being forced to park some distance (often several blocks) away from their destination... (This) situation downtown has worsened noticeably over the past 5 years or so."

Such complaints are common, particularly where handicapped-permits exempt permit-holders from pricing and time limit regulations. Field Surveys conducted during the first day of the Assistance workshop, however, quickly revealed the remarkable extent to which the permits are utilized. On most blocks, the majority of parked vehicles were displaying a hangtag permit.

Figure 5 - Each of these vehicles was displaying a handicapped-permit



Details of Privileges Conveyed by Handicapped-Permits

According to State of New Jersey law, these permits essentially provide 24 hours of parking once the driver enters the maximum payment accepted at the meter. During this 24-hour window, the driver cannot be penalized for over-staying the stated time limit, and is not required to pay anything for the extra

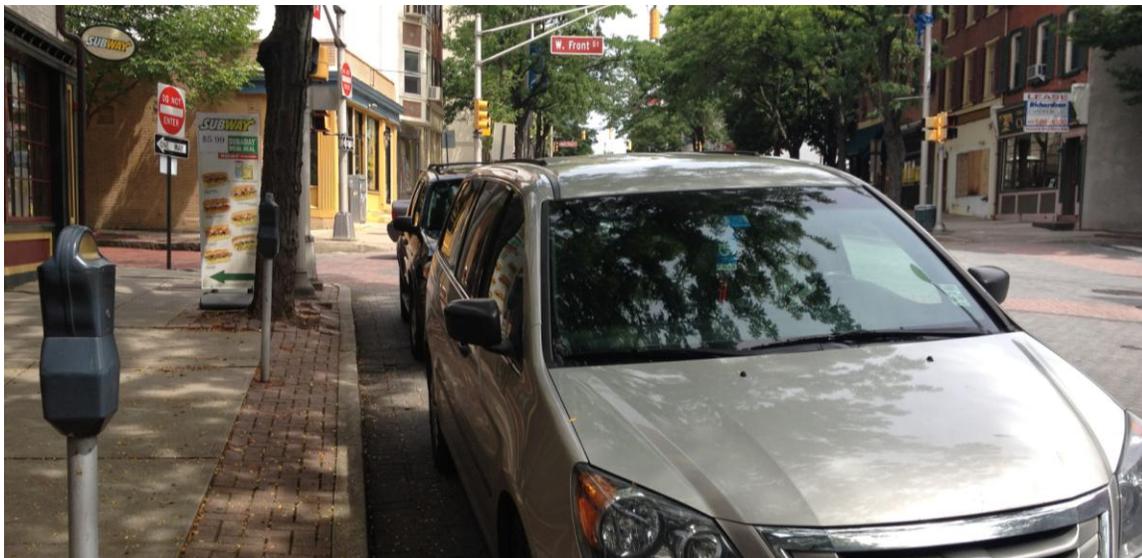
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time spent parked in the space. This creates an opportunity for commuters and residents with a handicapped-permit to park all day at a 30-minute meter for just \$0.50.

Expanding Impact of Handicapped-Permits

According to multiple Workshop participants, the impact of these permits was much more modest until about five years ago when the State of New Jersey cancelled some of its parking leases, and reduced the overall parking supply available to its employees. The State still provides free parking for all its employees who drive to work. However, the Workshop representative for the State Treasury noted that, while the offered parking is always within reasonable distance of the employee's office, that distance did increase for many employees following the change. Soon after, it seems, the handicapped-permits started to become much more prominent among cars parked on-street. As awareness of this phenomenon has expanded — they are hard to not notice as one walks around — the area of impact has expanded well beyond blocks immediately adjacent to large State buildings.

Figure 6 - Handicapped-permits are prominent, even on Trenton's primary retail streets



Enforcement

There appears to be popular frustration with a lack of enforcement effort to combat the obvious abuse of these permits. However, given the extent of parking privilege provided to permit holders, there is little that enforcement officers can do to stop them from using these spaces as they currently are. Perhaps more importantly, Field Surveys revealed that obvious parking violations including non-payment, over-staying time limits, and parking in no-parking areas were also going uncited among cars without any permit displayed. Until clear parking violations among these cars are more consistently cited, addressing permit abuse is unlikely to achieve meaningful changes at the curb.

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Figure 7 - Non-payment and other violations were common among vehicles lacking permits



Confusing, Conflicting, Out-Date, and Non-Strategic Regulations and Restrictions

Regulations, restrictions, and related signage are not effectively supporting on-street management and the needs of local businesses. Loading zones installed to support specific land use activity remain long after the land uses have gone. Similar needs for signage updates were also noted regarding no parking areas, taxi stands, and bus stops. Many signs do not clearly communicate the restrictions they are meant to convey, and some others are clearly contradictory. In multiple places, existing regulations and/or restrictions are poorly matched to their surroundings — a full block of 30-minute meters surrounded by off-street parking facilities, for example. These conditions were noted initially during the Capacity Audit surveys, and were also noticeable during Workshop Field Surveys.

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Figure 8 - 30-minute meters surrounded by off-street parking, blocks from any retail



Figure 9 – A single "NO PARKING ANY TIME" sign would be more effective here



Recommendable Practices Undermined by Lack of Enforcement

Like most cities, parking demand is highest within the commercial core of downtown Trenton. Within this area, meter rates are set at \$1 per hour. In the surrounding areas, the rate is set at \$0.75. Many cities have employed this pricing strategy to good effect, incentivizing parking on more remote blocks and redistributing demand more evenly across downtown. The combination of permit-abuse and ineffective enforcement, however, means that few drivers (regardless of whether they have a permit) are paying anything close to the stated rate, regardless of where they are parking. This negates any real potential for pricing to support effective on-street management. Likewise, loading zone and time limits can only be effective where most drivers can be compelled to comply with their restrictions.

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Lack of an advocate for better on-street management

The most common and important "root cause" for many of the issues identified above may be the lack of an effective manager-advocate for these downtown spaces. This absence is made more pertinent by the existence of the Trenton Parking Authority (TPA) — an organization that serves this role for off-street parking, but is not involved in the management of on-street resources. Many cities have ceded control of on-street parking management, including enforcement, to a parking authority or similar "third-party" focused solely on managing parking in support of the downtown economy. On-street management in Trenton, by contrast, remains under the control of the City's Parking Utility where staffing constraints appear to be limiting City engagement on many long-standing, downtown parking issues.

Bringing on-street parking under the control of the TPA has been recommended previously, including in the 2008 *Downtown Parking Policy and Sidewalk Design Standards* report, and the TPA has demonstrated potential to be a good steward of these resources, beginning with its close coordination with the TDA and local businesses on parking issues. The TPA recently started offering discounted monthly permits for downtown merchants and their employees to help business owners discourage these individuals from parking in front of storefront businesses. The TPA also helped initiate and sustain the now-dormant *Parking & Wayfinding Subcommittee* — a working group to explore downtown parking improvements, including implementing on-street management recommendations from the City's 2008 *Downtown Parking Policy and Sidewalk Design Standards* report.¹

3. Strategies and Actions

The following is a summary of potential strategies and actions for Trenton to explore as a means of continuing to investigate the issues, opportunities, and challenges identified during the Building Blocks technical Assistance in Trenton. These are presented merely as options that the community can consider; these are not recommendations and should be considered as starting points for the community's ongoing discussion to determine the viability of each idea.

Strategy 1 – Re-initiate the "Parking Committee"

One key set of background documents provided during the Assistance consisted of minutes from the 2008 *Parking & Wayfinding Subcommittee* meetings. The committee consisted of representatives of key downtown parking stakeholders, including the City, State, and County, as well as business and economic development advocacy groups. The Assistance activities present an opportune time to re-initiate a similarly-tasks committee. The following short-term actions should be part of this strategy.

- *Action* – Identify strategic partners, to included at a minimum: merchants, developers, members of the disabled community (whose access to handicapped-designated parking options is no doubt impacted by the current permit-use activity), the City's Parking Utility, and representatives from large, downtown employers beginning with the State and County.
- *Action* – Address the successes and setbacks of the previous committee to build upon achievements and avoid repeating any missteps, while taking into account changing conditions, particularly evolving political conditions.
- *Action* – Develop goals, objectives, and action timeframes based on discussions begun during the Assistance Workshop, including many of the "macro" issues driving significant merchant frustration and the lack of responsiveness from "City Hall".

¹ <http://www.trentonnj.org/cit-e-access/webpage.cfm?TID=55&TPID=9647>

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- *Action* – Develop immediate enforcement strategies, including the potential to fund increased parking enforcement staff, and tie that funding to performance measures linked to merchant-prioritized regulations such as the early-morning parking ban noted below in Strategy 2 – funding only continues if enforcement effort is visible at specified times, on 90% of weekdays, for example.
- *Action* – Develop potential long-term solutions for addressing handicapped-permit abuse. One option worth exploring is to shift to using pricing, rather than time limits, to generate turnover along commercial blocks. Modern meter technology allows parking managers to set an incremental rate structure that, rather than prohibiting long-term parking on-street, simply makes it prohibitively expensive. This is a best practice worth exploring on its own merits, as it provides parking customers with more flexibility and can be much more effective in maintaining turnover and availability. For Trenton, it has the added benefit of bringing parking costs for permit-holders and non-permit-holders into parity – playing as it does into the requirement for permit-holders to pay the maximum rate at the meter to avoid being cited for overstaying time-limits – and, therefore, disincentivizing the misuse of these permits for commuter parking.
- *Action* – Use this opportunity to collect information to create a comprehensive, downtown Parking Map. The City's planning department may have access to draft versions of such a map. This map, however, should include information relevant to downtown employees, residents, and visitors, including price, time restrictions, hours of operation for off-street options, and other key regulations/ restrictions. This map should be readily available in print form, as well as via the internet, to eliminate confusion about parking regulations and give peace of mind to downtown visitors that parking is readily available for their short-term needs.

Strategy 2– Continue to Explore Key Recommendations from 2008 Report

The 2008 *Downtown Parking Policy and Sidewalk Design Standards* report addressed many of the same issues noted during the Assistance, including the issue with handicapped-permits. Recommended actions that have not yet been fully implemented, yet remain viable options for improving multiple issues, include the following.

- *Action* – Centralize Parking Policy and Administration. This is the first recommendation from the report and remains a promising potential strategy, not only for better addressing current issues, but for creating a proactive advocate for heading off future problems before they become long-standing sources of discontent. According to the report, "The Trenton Parking Authority (TPA) would appear to be the logical entity to be given the responsibility, and TPA does have the authority under state law to effectuate planning, implementation and enforcement functions."² Further, the close connections and coordination between the TPA and the TDA brings the TPA that much closer to the stakeholders with the most to gain from improved on-street management; downtown businesses. The idea of consolidating on-street and off-street parking under the TPA appears to have had significant political momentum behind it until the most recent change in mayors. And according to the City County representative in attendance at the Workshop, it still may be favored by the Council.
- *Action* – Address Disabled Placard On-Street Parking Abuse. The key component of this recommendation in the 2008 report:

² Ibid, Section VII, page 2.

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"Until such time as the language of the existing statute can be modified, modify on-street parking restrictions to prohibit parking on City streets until after 10am. Since most commuters begin work prior to that time, on-street parking will be less feasible for those abusing the system. Since all vehicles, including those with handicapped parking placards, can be ticketed during periods when parking is prohibited, enforcement of this provision before 10am should free up on-street parking for its intended purpose"

Workshop discussions revealed that this recommendation had been adopted, including signage that was installed on a few retail-oriented blocks. Enforcement of these regulations and signs, however, was said to be non-existent. One Open House participant testified to the potential effectiveness of this strategy by noting that, when she has parked her own car in front of her store until 9:30 AM, that space will turn-over regularly for the rest of the day. By contrast, when she cannot do this, the spaces in front of her store are consistently occupied, all day by cars with handicapped-permits. Enforcing the regulations posted on these blocks appears to be a ready-made and very promising solution to this issue that would only require a concentrated enforcement effort for about 15 minutes each day. While some objections to these regulations (primarily regarding parking needs among businesses that open prior to 10 AM) had been noted by the Parking Committee, the merchants where these regulations are currently posted appear to strongly desire that they be given a chance to work.

Strategy 3 – Use the Capacity Audit Tool to Quantify Handicapped-Permit Impact

The Capacity Audit is designed to improve the management of parking resources by making it easier to monitor how they are being used. The Assistance Workshop focused on the behavior that is most important to quantify first – the overall utilization of resources during peak-demand periods. From this starting point, the same tool can be used to quantify sub-components of the observed utilization patterns. The most obvious component to focus on next is vehicles displaying handicapped-permits.

- *Action* – Use the Capacity Audit Tool to complete additional surveys. Quantify the number of vehicles displaying handicapped-permits while parked on-street during peak-demand periods. Use results to highlight: the overall level of utilization by these vehicles, the proportion of overall utilization levels represented by these vehicles, where they are parked, where they are most concentrated, and estimated meter-revenue impacts.
- *Action* – Consider also surveying to document all vehicles observed to be in non-compliance with meters or time limits, without being ticketed, to highlight the extent of broader enforcement issues, including staffing constraints

Strategy 4 – Conduct Peer/ Best Practices Review

The laws creating the issues regarding handicapped-permits in downtown Trenton are statewide laws that all cities must address. Beginning with an exploration of how other New Jersey cities have handled abuse of these permits, the TDA and TPA should conduct a Peer and Best Practices Review to identify strategic parking management steps that can directly address downtown Trenton's most pressing needs.

- *Action* – Build upon TPA research into statewide parking management best practices to identify peer cities for review.
- *Action* – Seek to identify practices that address abuse of handicapped-permits, as well as experiences that highlight the benefits of centralized, consolidated parking authority to manage on- and off-street public parking.

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4. Implementation Timeframe

The following table presents a suggested timeframe for exploring/ implementing the strategies and actions described above.

Suggested Actions	12-Month Schedule											
	1	2	3	4	5	6	7	8	9	10	11	12
Identify strategic partners	█											
Develop goals, objectives, and action timeframes	█											
Develop immediate enforcement strategies		█	█									
Develop potential long-term solutions for addressing handicapped-permit abuse				█	█	█						
Create a comprehensive, downtown Parking Map		█	█	█	█	█						
Centralize Parking Policy and Administration	█	█	█	█	█	█	█	█	█	█	█	>
Enforce Signed Early-Morning Parking Restrictions	█											
Complete additional surveys			█			█			█			>
Identify Peer cities for best practices review		█	█	█								
Identify most promising peer practices		█	█	█								

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5. Implementation Coordination

The TDA, in conjunction with the TPA, should initiate and lead implementation of the above strategies and actions. Re-initiating a Parking Committee will help identify strategic alliance needs and opportunities, as implementation strategies are explored. The following table presents coordination alliances likely to be useful or necessary for implementing the actions suggested above.

Suggested Actions	Key Implementation Partners								
	TPA	Merchants	City Parking Utility	City Policy Makers	State and County Reps	CCRC*	City Police Department	City Planning	Mercer County TMA
Identify strategic partners	✓	✓	✓	✓	✓	✓	✓	✓	✓
Develop goals, objectives, and action timeframes	✓	✓	✓	✓	✓	✓	✓	✓	✓
Immediate enforcement strategies	✓		✓				✓		
Long-term handicapped-permit abuse solutions	✓	✓	✓	✓	✓		✓	✓	
Comprehensive, downtown parking map	✓				✓			✓	✓
Centralize parking policy and administration	✓	✓	✓	✓	✓		✓		
Enforce early-morning parking restrictions	✓		✓				✓		
Complete additional surveys	✓								
Identify Peer cities for best practices review	✓	✓	✓	✓	✓	✓	✓	✓	✓
Identify most promising peer practices	✓	✓	✓	✓	✓	✓	✓	✓	✓

*Capital City Redevelopment Corporation