City of Bellingham
210 Lottie Street
Bellingham, WA 98225

MEMORANDUM

TO: BELLINGHAM CITY COUNCIL

FROM: BLAKE LYON – DIRECTOR – PCDD
ERIC JOHNSTON **–** DIRECTOR – PUBLIC WORKS

SUBJECT: PARKING MINIMUMS

DATE: MAY 20, 2024

SUMMARY:
At its February 12, 2024, meeting the City Council requested the legislative analyst prepare a white paper on how other jurisdictions are approaching the topic of eliminating parking minimum requirements. The City Council further request the Administration to prepare a study session, which would allow for an informed discussion and evaluation of the policy implications associated with eliminating parking minimum requirements. The requested white paper can be referenced as an attachment, and the following report establishes the framework for a City Council study session on the matter.

BACKGROUND:
Popularity of the automobile gained significant traction in this county following the conclusion of World War II. With the rise in automobile ownership came the need or desire for more organized parking provisions. On February 10, 1947, the City of Bellingham adopted its first Zoning Ordinance.

This ordinance included the three different parking standards:

- Multiple unit residences and apartments establish parking requirements for “as many automobiles as there are apartments or housekeeping units”.
- Commercial uses has to provide parking if their use “cause customers, employees, or residents to park their vehicles of transportation for one hour or longer.”
- Theatre, Auditorium, or place of assembly had a parking ratio of 200 square feet for every 10 seats.

It was not until July 24, 1950, under ordinance No. 6706, that the City allowed accessory buildings, including one private garage.

The Zoning Code was amended again on May 23,1969, under ordinance No. 8623 and 8339, which:

- stablished off-street parking requirements by use (29 different categories)
- established off-street parking standards and site circulation (with diagrams)
- established loading design standards

These amendments served as the precursor to the codes that are in place today (although there have been a series of smaller amendments between 1982 to 2024, all of which can be referenced in the Bellingham Municipal Code under 20.12.120). Today's current parking regulations utilize 34 different use categories, each with their own parking requirements.

Many local governments referenced or relied upon the Institute of Transportation Engineers (ITE) – publication of parking generation manual to help establish minimum parking requirements. These parking generation rates used in urban areas (e.g. Bellingham) were often very conservative and used a baseline of suburban development standards with little to no transit, little to no parking management, and were based on peak demand periods. It is also worth noting that ITE was founded as an organization focused on moving as many cars and trucks as fast as possible in the 1930s. There was no attention or priority given to pedestrians, mass transit, or alternative modes. In more recent years, ITE has distanced itself from the parking generation manuals as a carte blanche basis for regulation and instead refers to them as educational materials.

According to University of California at Los Angeles profession Donald Shoup "Half the 101 parking generation rates are based on 4 or fewer studies, and 22% are based on 1 study. The parking generation rates thus typically measure the peak parking demand observed at a few suburban sites with ample free parking but little or no transit ridership. Urban planners who use these parking generation rates to set minimum parking requirements therefore shape a city where everyone will drive wherever they go and park free when they get there." Truth in Transportation Planning (UCLA.edu)

EXISTING REGULATORY CONTEXT:

The City currently employs a broad range of parking regulations, policies, and management techniques that can vary substantially depending on the land use and neighborhood.

In many of our older, predominantly single-family residential neighborhoods parking was often provided in single car detached garages that were accessed from an alley or placed in the rear of the property. Over the subsequent decades that development pattern began to change, and more properties were designed to accommodate two-car garages and more attached garages. Today's development code regulations require single family residences to provide two parking spaces, plus one additional parking space for each bedroom over three. However, no more than two enclosed garage parking spaces per unit may count toward meeting parking requirements.

Despite these land development requirements, it is not uncommon for garages to be used partially or entirely for non-parking purposes, such as, but not limited to, storage, workshops, home offices, guest accommodations, etc. When these circumstances occur residents often park vehicles in the driveway (when available), elsewhere on the property, or on the adjoining street(s).

Multi-Family residential parking ratios are structured a bit differently from single-family residential and rely more heavily on a per unit bedroom count. For example, studio units require one parking space, while one- and two- bedroom units require 1.5 spaces per unit,

and three-bedroom units require two spaces per unit. Parking spaces can be provided in a wide array of configurations from surface lots, to tuck under spaces, to garages or parking structures. It is less common for multi-family residential parking spaces to be taken over by non-parking purposes in part because many multi-family properties utilize additional regulatory provisions such as rental or lease agreements, apartment or condominium association bi-laws or covenants, conditions, and restrictions (CC&Rs), etc.

Urban Villages, even though they are comprised of mostly multi–family residential units have different, often less restrictive given the specific intent to have Urban Villages be compact urban spaces that are filled with a wide range of land uses, shared parking opportunities, and a more walkable development pattern. Parking in Urban Villages can differ from village to village, but it is not uncommon to see a mix of parking structures (both private and public), surface parking lots, on-street parking, etc. Downtown, Old Town, Fairhaven urban villages all have some areas that are exempt from parking requirements (on a per property basis), and both Downtown and Fairhaven have municipal parking supply.

Non-residential parking requirements are significantly more complex and carry a heavier regulatory framework. In the Bellingham Municipal Code parking requirements are divided into different subcategories such as commercial, health care, public assembly, industrial, etc. Each of these subcategories then has a list of uses, each with their own parking requirements. It's not uncommon to have the methodology written in different formats adding to the complexity. For example, professional offices require one parking space for every 350 square feet of floor area, while doctor offices require five parking space for each 1,000 square feet of gross floor area and small animal hospitals require five spaces for every veterinarian, etc. Non-residential parking accommodations outside of an urban village are often provided as surface lots (e.g. schools, Bellis Fair mall, the grocery store, churches, etc.) unless the use is so concentrated that it warrants a parking structure, such as the hospital, Western Washington university, etc.

The Bellingham Municipal Code (BMC) also has several other parking management regulations that influence the built environment. Chapter 11.38 establishes Residential Parking Zones (RPZ), of which the City currently has two located in the environs surrounding Western Washington University. The intent of the RPZ is to help manage the utilization of on-street parking and to secure an ample supply of parking for residents and visitors through the issuance of parking permits. Permits are issued only to persons who reside in a legal dwelling unit in the residential parking zone.

In addition to the aforementioned RPZs the BMC allows for the number of required parking spaces to be altered through either a variance, which is considered by the City's Hearing Examiner via a Type III process, quasi-judicial review and decision, or through a parking waiver or joint parking agreement, which is considered by the Planning Director via a Type I process.

POLICY FRAMEWORK:

The over the past several decades the City has shifted its policy framework and has made efforts to move away from the suburbanization of the city where land use decisions were dominated by an oversupply of surface parking lots, which often went underutilized, to an

approach where parking is more heavily managed in certain districts. The objective was to provide more shared parking resources and by doing so the overall number of parking spaces could be reduced. There are several examples that illustrate this approach.

The Fairhaven parking district was established via resolution 43-94 and again by Resolution 2003-08. The resolutions eliminated on-site parking requirements, required street improvements. Prior to the implementation of this approach the parking supply was largely seen as inadequate until parking management was put in place. One of the key principles of parking management was the utilization of paid parking. By charging an appropriate fee for the parking space ensured that parking spaces so a higher level of turnover, thereby making more parking spaces available.

The City's Downtown plan through Goal 8.1 seeks to maximize the efficient use of existing parking supply. To help realize this goal the City has several municipal parking structures, parking lots, and metered on-street parking. By supplying these public parking spaces, the City was able to establish a district exempt from parking requirements, which intern allows for a compact urban form and a walkable downtown.

Last year in 2023, the City Council agreed to eliminate parking requirement in the Old Town sub area plan. This modification in the zoning regulations and the associated development agreement has allowed an area that has gone underdeveloped for decades to experience some renewed development interest.

It is also important to note that an oversupply of parking encourages and often induces greater dependence on vehicles. Not only does it spread land uses further apart, but it also results in a greater amount of impervious surfaces, which in turn increases the heat island effect. For these reasons and others, the 2019 Climate Action Plan Task Force (Section 3) recommendation, accepted by Council, includes reform of parking policies. More specifically it recommends:

1. Eliminating parking minimums and establishing parking maximums
2. Ordinance requiring unbundled parking (separating the cost of renting a parking space from the cost of renting a dwelling unit) in all rental housing
3. Increase cost of hourly metered parking and increase parking ticket fees
4. City Employee parking fees

The City has also made a commitment to a Transportation Mode Shift by establishing a policy that focuses on a 20% reduction in single occupancy vehicle use between 2016 and 2036. These gains are expected to come mostly from increased walking, biking, and transit usage. Unfortunately, however, we are not on track to meet that goal, despite the efforts outlined in the comprehensive plan. Additional actions are needed. Continuing to build infrastructure for and store for free, conveniently, and with full availability, the single occupancy vehicle is counterproductive to meeting the goals of the comprehensive plan.

DISCUSSION:

The following section is intended to highlight some discussion points around the elimination of parking requirements so that these topics are top of mind when reading through the different alternatives referenced further below. The discussion points are presented in a more conversational manner and are based off observations, anecdotal

pieces of evidence, and industry norms. They are not based on statistics or empirical studies, although many studies and formal observation do exist.

a. Human Behavior:
    - Many people in our community do not use their garages for parking. They use them for storage, home offices, additional living spaces, workshops, laundry rooms, exercise rooms, etc. Others may have a two-car garage and only park one vehicle in the garage. The vehicles that are not parked in the garage are often parked in driveways, on other parts of the lot, or on the street.
    - Those that park on the street often do so with particular habits or preferences. For example, someone may choose to park directly in front of their property, in the same spot all the time, and despite the on-street space being a public amenity, there can be frustration or tension created if those habits or preferences are interrupted. “Someone else is parking in front of my house, in my spot”, even though the on-street parking spaces are not individually owned or assigned and remain available for public use (in accordance with applicable rules and regulations).
    - When parking somewhere other than a place of residence, such as downtown, studies indicate that people are often looking for a parking space with the following preferences: 1) they want a space directly in front of their final destination, 2) they want the space available when they arrive, 3) they want to park their as long as they need to, and 4) they do not want to pay for the parking space. The challenge with these preferences is you cannot have all of them at the same time. If someone were allowed to park there as long as they like then there is no incentive to turn the space over, therefore it is unlikely to be available when someone else is looking for a space. If the parking space is “free” then it is not accounting for the cost to construct or maintain that space. Someone is paying for that space, especially when there is an over production of parking spaces that result in separated land uses, limited walkability, decrease in pedestrian safety, increase in heat island effects, etc.
    - Another aspect of human behavior when parking somewhere other than a place of residence is that people prefer on-street spaces. If on-street spaces are not available then the next order of preference is for a surface parking lot, followed by an above-ground parking structure, and lastly a below-ground parking structure. The other interesting aspect of this order of preference is that it has an inverse correlation with the cost to provide those parking spaces. The least expensive to construct is the on-street space and the most expensive is the below-ground structure.

b. Cost of construction:
    - There are a number of variables that can impact the cost of constructing parking spaces, such as, but not limited to land value, stormwater requirements, landscaping requirements, materials, labor, design, permitting, operations, maintenance, etc. Prices often differ from state to state, even city to city, but research indicates that surface lots (100-car single-level lot) can range generally between $78 to $200 per square foot, with a national average being about $210,000 for a parking lot or $21,000 per space. Surface parking

spaces in the state of Washington cost approximately $83 per square foot. Therefore a 10'x 20' parking stall would cost approximately $16,600 in 2023.[1]

- According to Forbes Home[2] the national average cost to build a garage is $24,000 with single-car garages being as low as $7,250 while an attached three-car garage can cost $50,000.
- Parking structures are more expensive, can generally range between $115 to $300 per square foot, with average Washington prices coming in at $123 per square foot or approximately $24,600 per space (and can be up to $60,000 per parking space).

c. Environmental Impacts:
   - The over production of parking spaces, in particular surface parking lots, can have a range of environmental impacts including, but not limited to:
     - Heat Island Effect – which is generally defined as heat being absorbed and re-emitted from buildings, roads, and other hardscape surfaces. This can cause urbanized areas to experience higher temperatures than outlying areas. According to the EPA, daytime temperatures in urban areas are about 1-7 degrees higher and nighttime temperatures are about 2-5 degrees higher.[3]
     - A separation of land uses, spreading things further apart, can result in a higher level of auto dependency, thus increasing the amount of vehicle miles traveled (VMT), which can in turn lead to higher levels of air pollution, as well as greater traffic congestion, which could result in the desire for more roadway infrastructure that has the potential to impact our wetlands and other critical habitat areas.
     - Increased surface parking and roadways resulting in high amounts of impervious surfaces, which impacts our ability to natural absorb stormwater.

d. Walkable neighborhoods:
   - The elimination of parking requirements has the potential to reduce the need for curb cuts to provide access to driveways and garages. Fewer curb cuts can help reduce conflicts between cars and pedestrians at driveway locations. The elimination of garages can also encourage more attractive housing that is not dominated by garage doors, but rather supports design features such front porches and provides room for more landscaping.

e. Increase housing costs:
   - As previously mentioned, all forms of parking can add to the construction cost of housing. Additional consideration should be given to the opportunity cost of constructing parking over other forms of land utilization, whether that is space

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[1] Parking construction costs in the U.S. 2023, by city | Statista

[2] Average Cost To Build A Garage – Forbes Home

[3] Heat Island Effect | US EPA

for additional housing units, additional tree plantings, stormwater facilities, and/or utilities, all of which compete for finite space.

- Unbundling the parking or eliminating the need to provide parking can also help reduce the cost of housing for single-family and multi-family homes whether you are considering ownership or rental units.
- Recent discussions with a local developer indicated that parking can be between 10 – 15% of the cost of a project. However, when marketing a project, the units can be marked up to 20% above costs because of the additional amenity.

f. Is parking a regulatory issue or a management issue?
    - Studies indicate that in this country we have an overabundance of parking availability to the tune of 6 parking spaces per vehicle. This overabundance of parking would suggest that our parking regulations are not in sync with our needs. Where parking pain points are experienced, the introduction of parking management techniques can largely help address those concerns. Parking management can consist of both formal and informal methods. Informal can be simple things like better, more efficient parking standard like requiring parallel on-street parking or angled on-street parking, and not leaving it up to the driver to decide (imaging parking in an area that is undefined such as an overflow lot… without out an attendant or any formal striping some people park far apart or angled… and you are left thinking if they only had moved over a bit I could totally fit in there). Formal methods can be anything from technology, attendants, pay stations, permits, to enforcement efforts.

g. Technology:
    - Parking technologies are now readily available to help aid both the user and the entity managing the facility. These technologies can be employed to help the user find an available space, pay for the use of space, track utilization, support enforcement efforts, etc.

h. Implementation tools:
    - Transit upgrades and lowered parking rely on one another to function, but neither generally happens without the other. A **fee-in-lieu system** could break this cycle. Such a system could link lowered parking requirements with better transit funding (i.e. parking fee-in-lieu that directs the funds toward transit access, including both transit service and pedestrian connections). This could be a great step toward a more transit-connected and pedestrian-focused future. It can be calculated to balance several policy priorities simultaneously.
    - It is worth noting that given the lack of readily available land, site constraints, the complexity of land use regulations, and the cost of construction, or a combination thereof, many multi-family projects often request some form of consideration to reduce on-site parking requirements through variances or waivers.

ALTERNATIVES: All the following scenarios would keep uniform standards regarding Americans with Disabilities Act (ADA) parking spaces, bike parking, electric vehicle

parking, access (via alleys, driveways, etc.), form (dimensional requirements, location, fire lanes, etc.), and sight visibility and site circulation.

1. **Elimination of parking minimums citywide** – change the mandatory parking requirements to optional.
   a. Pros:
      - Easy to administer, limited impact on staff.
      - Allows the market to decide how much parking is needed per project.
      - Reduces cost of development, which could allow more projects to be constructed, especially much needed housing.
      - Reduces the environmental impacts associated with surplus parking.
      - Provides more room on sites for other priorities such as tree retention, stormwater, additional housing units, etc.

   b. Cons:
      - Not all portions of the city are equipped with the necessary infrastructure to be able to provide ample on-street parking.
      - Not all portions of the city are equipped with pedestrian infrastructure such as sidewalks, crosswalks, and street lighting.
      - Elimination citywide would make it more difficult to anticipate where development is likely to occur and therefore make it more difficult to plan the necessary infrastructure.
      - Some portions of the community could experience growing pains as more people compete for on-street parking spaces.
      - If the market results in under parked developments the impacts could be experienced by surrounding properties.
      - Reducing/removing parking requirements in one big leap has the potential to create an **equity issue**. The first project or two in an area may rely on limited street parking, but later projects will need to provide more parking than they otherwise might have planned if everyone had still had some parking requirements. This becomes a pendulum, where some projects bear more of the vehicular infrastructure burden than others. They will eventually find a balance, but there could be some inequities in the meantime.

   c. Variation – eliminate parking minimums, establish parking maximums.

2. **Transit Oriented Development (TOD)** – eliminate parking requirements within urban villages and within ¼ mile of high frequency bus routes.
   a. Pros:
      - Incentivizes new development near transit facilities where people would have greater access to alternative means of transportation.
      - Allows the City to plan infrastructure in a more structured manner.
      - Reduces the environmental impacts associated with surplus parking in some areas of the city.

- Provides more room on sites for other priorities such as tree retention, stormwater, additional housing units, etc. for certain portions of the city.

b. Cons:
   - Requires higher levels of administrative review.
   - Does not open up as much of the city to benefits, which could reduce the number or amount of new development in some portions of the city.
   - Some portions of the community could experience growing pains as more people compete for on-street parking spaces.
   - If the market results in under parked developments the impacts could be experienced by surrounding properties.

c. Variation – Expand the ¼ mile distance to a ½ mile, thereby making the parking elimination available to more properties.

3. **By Land Use** – Eliminate parking requirements for residential land uses, but retain the parking requirements for non-residential land uses, such as commercial, industrial, healthcare, etc.
   a. Pros:
      - If housing is the primary objective, then this option opens capacity for additional housing units.
      - Relatively simple to administer.

   b. Cons:
      - Does not open as much of the city to benefits, which could reduce the number or amount of new development in some portions of the city.
      - Does not provide the environmental gains to the degree other options might, especially if non-residential land uses are allowed to develop larger surface parking lots.

4. **By Geographic Area** – Eliminate parking requirements for areas with less topography or for areas that are more walkable and have been built around a gridded roadway network.

   a. Pros:
      - Parking requirements are a critical tool for the City if there is a desire to direct growth intentionally. House Bill 1110 opens middle housing options across the city, but it also produces challenges from an infrastructure (utilities, transit, and pedestrian) standpoint. In an effort to use City resources efficiently, the City would need to focus improvements and growth in specific areas. Removing parking requirements everywhere while simultaneously opening density everywhere could unintentionally encourage sprawl without providing the parking infrastructure to support it. Ideally it would be beneficial to combine a fee-in-lieu option with a geographic focus option, thereby

allowing for paying into a transit fund rather than providing parking only in the areas where the Transit Agency intends to increase transit service and the City wants to encourage growth.

b. Cons:
   - Requires higher levels of administrative review.
   - Does not open as much of the city to benefits, which could reduce the number or amount of new development in some portions of the city.

5. **Status Quo** – Retain existing parking requirements.
   a. Pros:
      - Familiarity with implementation
      - Greater degree of predictability

   b. Cons:
      - Parking spaces compete with other priorities, such as the need for more housing units, stormwater treatment, tree retention, etc.
      - Adds a significant amount to the cost of construction, thereby contributing to the higher cost of housing.
      - Reduces the number/amount of environmental gains sought by the City.