



October 11, 2017

This memorandum is in response to the recommendations section in the South Baltimore Gateway Parking Study (“study”) Final Report dated September 20, 2017. This study was conducted by Whitman, Requardt and Associates, LLP (WRA) as part of the Complete Streets Study of South Baltimore. The Parking Authority of Baltimore City (PABC) has been the City of Baltimore’s main point of contact for this study and has provided guidance, support and data. But the report, its findings and recommendations were determined independently by the creators of the study report, WRA. The PABC wants to take this opportunity to respond to the recommendations cited in WRA’s Parking Study report.

### **Demand Management (Page 36)**

The PABC supports the use of alternative modes of transportation as a way to reduce parking demand. Specifically, we have been instrumental in bringing car sharing to the City. We continue to examine ways to enhance and expand the existing fixed location car sharing service, to add other fixed location car sharing vendors, and introduce point-to-point car sharing services.

### **Enforcement (Page 36)**

The PABC agrees that robust parking enforcement is a major component to improving parking management. Parking enforcement needs to occur consistently, thoroughly and efficiently to achieve this objective.

### **Enforcement Responsibility (Page 36)**

The PABC agrees that the City of Baltimore should have a dedicated parking enforcement unit with adequate staffing, resources, equipment and management software. We believe it would be worthwhile to explore the possibility that this enforcement unit be part of the PABC so that the implementation, maintenance and enforcement of parking programs can be seamless.

**Enforcement Technologies (Page 37)**

The PABC agrees with the importance of acquiring and implementing better enforcement technologies. In fact, we are working to implement new technologies using license plate recognition (LPR) equipment to manage parking and help make it possible to more efficiently and frequently enforce metered parking and Residential Permit Parking (RPP) regulations.

**Fines (Page 37)**

The PABC thinks that fines are an important first action in the enforcement framework, but also believes that there is a segment of the violations where the fines are disregarded chronically. In those cases, a more physical approach could be warranted such as the application of wheel boots on vehicles and/or towing to help promote better compliance with the parking regulations.

**Residential Permit Parking Management (RPP) (Page 37)**

The PABC believes there is a misunderstanding about the RPP program, as expressed in the study report, and the program objectives. The RPP program as described in §10-2 of Article 31 of the City of Baltimore Code states, “the Mayor and City Council finds and declares that serious adverse conditions in certain residential areas of the City result from motor vehicle congestion, particularly long-term parking of motor vehicles on the streets of those areas by non residents.” As specified, the program is designed to minimize long-term parking of nonresidents in designated (RPP districts) residential areas that experience high levels of nonresident parking. The study report, however, implies the objective of the RPP program is to find parking close to residents’ homes. Because the report does not indicate the extent of nonresident parking in the subject neighborhoods, it is not able to determine, with certainty, the effectiveness of the RPP program in South Baltimore. The high demand in the neighborhoods could be the result of high indigenous neighborhood demand which the RPP program is not designed to curtail. While limiting the number of permits is an approach that could be undertaken, the PABC believes that any decision in that direction requires the participation of the community, the RPP Advisory Board as well as the City Council member for this area. Additionally, better enforcement should precede any changes to the RPP program, and subsequent analysis should be conducted to determine the effectiveness of better enforcement.

**Number of Permits per Household (Page 38)**

As stated above, the PABC thinks limiting the number of permits per household could have merit and is worth considering but requires the participation of the community, the RPP Advisory Board as well as the City Council member for this area. Additionally, better enforcement should precede any changes to the RPP program, and subsequent analysis should be conducted to determine the effectiveness of better enforcement.

**Pricing (Page 38)**

Also, as stated above, the PABC thinks a graduated pricing approach could have merit and is worth considering but requires the participation of the community, the RPP Advisory Board as well as the City Council member for this area. Once again, better enforcement should precede any changes to the RPP program, and subsequent analysis should be conducted to determine the effectiveness of better enforcement. It should be noted that such an approach, if adopted, might not be appropriate in all RPP districts.

**Ration total number of permits issued in an area (Page 40)**

The PABC believes this recommendation to ration the number of permits in an area is problematic and difficult, if not impossible to administer. It would be easy to imagine that such an approach could generate competition for permits and possibly lead to hostilities in the neighborhood. This would not be productive and would not be in keeping with the civic minded objectives of the program which are geared toward protecting the neighborhood from undue burdens.

**RPP Zones and regulations (Page 41)**

In regard to Area 41, it should be noted that the law allows Sharp-Leadenhall to enjoy zero (0) hour RPP. The combination of any districts including Area 8 and Area 41 requires the participation of the community, the RPP Advisory Board as well as the City Council member for this area.

In regard to expanding Area 19, this too will require the participation of the community, the RPP Advisory Board and City Council member for this area.

On Covington Street adjacent to Federal Hill Park, the parking in this area is metered but also allows RPP Area 9 permit parking at night and in the early morning. This is a special consideration. Because of the nature of adjacent uses and their hours of operations which are during the day, the main intention of the night time meter hours in this area is not parking management; it is to reduce and eliminate unwanted criminal activity. This unique circumstance makes it possible to forge a special parking arrangement that can serve the residents after business hours. PABC is only open to this type of arrangement under these special circumstances, and to also allowing Area 19 permit parking at those spaces at night provided the City Council member is consulted and supportive of the approach.

### **Paid Parking (Pages 41 and 42)**

As explained on Page 34 of the study report, demand-based pricing will help provide parking availability throughout metered areas. Because Project Space, which designates handicapped parking spaces throughout the commercial areas and requires all to pay for metered parking, was implemented when this study was beginning, parking utilization data will need to be collected and evaluated to determine the correct pricing on each block face to provide availability. This will be an iterative process. Table 20 makes an effort to compare off-street garage parking with on-street parking rates charged, but the PABC maintains that this is not an appropriate comparison because the parking uses are different where commercial on-street parking is more short-term and off-street parking is longer term and the inherent costs of on-street and off-street parking, especially garage parking, is different. No meaningful conclusions can be drawn as such.

### **Better Directional Signage to West Street Garage (Page 43)**

The PABC agrees with this observation that better wayfinding signage should be considered for the West Street Garage, and it will be re-examing the area for installation of additional signage especially as Cross Street Market is redeveloped.

## **Additional Supply**

### **Angle Parking (Pages 44-45)**

The PABC agrees with this recommendation. It is sensible and cost-effective to more fully utilize the existing right-of-way to create parking capacity.

### **West Street Garage (Page 46)**

The PABC has evaluated the possible expansion of the West Street Garage previously. In each instance, it has not been feasible financially. We will continue to observe conditions, and will reexamine financial feasibility, especially as redevelopment continues in the area.

### **Shared Parking (Page 46-48)**

The PABC agrees with this recommendation to encourage and support shared parking arrangements between private parties.

## **Other**

### **Unbundled Parking (Page 49)**

The PABC is in general agreement with this concept of unbundling parking which involves decoupling parking from the use to the extent that parking demand is not assumed to be equal for all uses even similar uses. It should be noted implementation of this will likely involve other actions and considerations.

### **Parking Guidance (Page 49)**

The PABC agrees with this in principle, but has not seen a parking guidance system that is cost effective and accurate for the City to be integral in its provision. Systems are being proposed and revised regularly, so it might be possible in the near future, even if it is not City sponsored.

**Consistent time limit for passenger loading regulation (Page 49)**

The PABC is open to considering this, but because of the variable characteristics and needs of businesses, this might not be practical. It is also not apparent how this in and of itself would necessarily help improve the parking conditions in South Baltimore.