



City of Sanibel

Land Development Code Review Subcommittee

PLANNING DEPARTMENT Staff Report

LDC Review Subcommittee Meeting: June 11, 2024

LDC Review Subcommittee Agenda Item: 5a.

SUBJECT: Nonresidential Parking Standards (Chapter 126, Article XV, Division 2, Subdivision III)

ISSUES

- Minimum off-street parking requirements add cost and time to permitting; and are especially impactful to smaller properties with less area for additional spaces.
- Over-precision of parking requirements by land use types increases change of use permit requirements and associated fees (i.e. change to use with different parking standards).
- Shared parking is encouraged by existing policy, but few properties have implemented such plans.

ATTACHMENTS

A	Land Development Code Chapter 126, Article XV, Division 2, Subdivision III. – Nonresidential uses
B	Planning Memorandum dated April 11, 2023
C	<i>The High Cost of Free Parking, Chapter 2: Unnatural Selection</i> , Shoup 2005
D	<i>Parking Reform Will Save the City</i> , Shoup, CityLab 2019
E	<i>The Strongest Case Yet That Excessive Parking Causes More Driving</i> , Jaffe, CityLab 2016
F	<i>Parking Policy is Hot. Thanks to Donald Shoup</i> , Bliss, CityLab 2018
G	<i>This Little-Known Rule Shapes Parking in America. Cities are Reversing It</i> , CNN.com 2023
H	<u><i>Parking Laws are Strangling America</i></u> , Climate Town 2023
I	Land Development Code, Sec. 126-33. – Institutional uses, Sec. 126-855. – Inter- and intra-connectivity, , and Sec. 126-1176. – Generally (Home Occupations)

BACKGROUND

Nonresidential parking standards are provided in Chapter 126, Article XV, Division 2, Subdivision III of the Land Development Code. The subdivision was originally adopted in 1985, along with many other standards adopted in the first Land Development Code. It's not clear how minimum parking standards for each use were determined. The subdivision was last amended by Ordinance 06-022, when several conditional uses were added to the code. A copy of existing standards is included as **Attachment A**.

Staff identified minimum off-street parking requirements as an area of review during the Zoning in Progress authorized by City Council Resolution 22-056.

City Council adopted Ordinance 23-005, which reduced minimum parking standards for residential uses, and Ordinance 24-005, which removed parking requirements for dwelling units at a mixed-use development.

In April 2023, Planning staff led a discussion with Planning Commission regarding various standards and post-disaster challenges for commercial uses. The agenda memorandum regarding commercial uses is included as **Attachment B** – off-street parking is discussed on pages six and seven.

Lastly, in December 2023, Planning Commission approved a priority list for Land Development Code amendments in 2024, including nonresidential parking standards as a “first level priority.”

ANALYSIS

Staff has primarily relied upon *The High Cost of Free Parking* (2005) written by planning scholar Donald Shoup and published by the American Planning Association. The book represents one of the first texts to establish planning theory for parking and is considered required reading for aspiring transportation planners.

Attachments C - E, including Chapter 2: Unnatural Selection from *The High Cost of Free Parking* and other related articles/videos, expand on the broader topic of off-street parking requirements.

Below are some of the more relevant findings from the text:

- Minimum (free) off-street parking requirements subsidize vehicle trips.
- Off-street parking requirements increase the cost of development/redevelopment.
- Approximately 330 sf is necessary to provide a single parking space.
- 8 to 12 bicycles can be parked in the same amount of area as a typical vehicular parking space.
- Until *The High Cost of Free Parking* was published in 2005, there were no Planning textbooks that explain a theory behind parking policy (that is, parking standards were created and put into effect with little to no supporting data).

- Planning Advisory Service (PAS) reports and other planning research found most planning professionals “survey nearby cities” as the primary source of information for recommending parking policies, with referencing the “Institute of Transportation Engineers (ITE) handbooks” in second.
- The samples given in the ITE Handbook are statistically insignificant with sample bias due to pervasive use of limited studies in suburban communities with few or no alternative transportation modes and where all parking is free.
- Studies and data disprove the notion that parking demand is related to floor area.
- Minimum off-street parking requirements impose enormous costs on the economy and the environment.

Donald Shoup concludes his book with three reforms:

- Charge fair-market pricing for on-street and off-street public parking.
- Return the resulting revenue to districts to pay for public improvements (i.e., Shared Use Paths, rest areas/amenities, vegetation buffers).
- Remove minimum off-street parking requirements.

...

The Sanibel Plan is largely silent on parking policy. Section 3.3.3. Transportation Element (Sanibel Plan) Objective 3 imparts the “provision of adequate on-site and off-site parking for existing and future uses”, and Objective B6, Policy B6.1. of the Future Land Use Element (page 227), includes “provide for on-site parking” as an objective for future land uses.

However, the most direct endorsement for reducing off-street parking requirements is stated on page 102:

Ultimately, the City will look for opportunities to reduce the amount of land area devoted to streets, roads and parking areas for private motor vehicles.

This is underscored by Policy 3.4, which states:

The amount of parking, public and private, will not overwhelm the resources of individual sites and land uses and will not overwhelm the human-made and natural resources of the City.

Furthermore, Policy 2.17 of the Transportation Element supports taking measures for “auto ridership reduction.” This is notable in the context of studies that find minimum parking requirements increase vehicle trips.

PUBLIC COMMENT

There have been no written public comment provided to staff.

RECOMMENDATION

Staff recommends adoption of a parking policy that no longer references the ITE Handbook or Trip Generation and no longer calculates parking demand by floor area. Staff does not recommend establishing an arbitrary minimum standard.

In recognition of on-site parking as an objective of the Future Land Use Element (Sanibel Plan), staff does not recommend total deregulation of off-street parking supply either. Instead, staff recommends off-street parking to be constructed and maintained as a general requirement with only specific parking supply requirements for conditional uses established on a case-by-case basis by Planning Commission, as guided by specific information provided by the applicant, including but not limited to a parking study.

Staff also recommends adoption of three incentives to reduce the burden of parking requirements upon applicants:

- (1) Allow a shared parking plan between adjacent properties to be submitted in lieu of a parking study; and
- (2) Allow on-street parking in lieu of off-street parking (on local roads only); and
- (3) Allow a reduction of one parking space for every 10 bike parking spaces provided in a bike corral or similar infrastructure.

Lastly, staff recommends associated amendments to Sec. 126-855. - Inter- and intra-connectivity to facilitate shared parking improvements, as well as Sec. 126-33. – Institutional uses and Sec. 126-1176. – Generally (Home Occupations), which have references to current parking policy. A copy of those existing sections is provided in **Attachment I**.