



# COMPREHENSIVE PLAN UPDATE

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Transportation, Infrastructure and Environmental Sustainability  
Steering Committee

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Brad Cassidy  
Nella Davis-Ray  
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410 Abbot Road  
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## AGENDA

**February 19, 2014 – 7:00 p.m.**  
Hannah Center, Room 211  
819 Abbot Road

- 1) **OPENING**
  - A) Roll Call
  - B) Approval of Agenda
- 2) **ADA TRANSITION PLAN**
- 3) **VISUAL PREFERENCES**
- 4) **RIGHT OF WAY ACTIVITY**
- 5) **ADJOURNMENT**



# **PLANNING, BUILDING & DEVELOPMENT**

Quality Services for a Quality Community

## **MEMORANDUM**

**TO:** Transportation, Infrastructure, and Environmental Sustainability Steering Committee Members

**FROM:** Timothy R. Schmitt, *AICP*, Community Development Analyst  
Catherine DeShambo, Environmental Services Administrator  
Robert Scheuerman, Engineering Administrator  
Daniel O'Conner, Parking Administrator

**DATE:** February 14, 2014

**SUBJECT:** February Steering Committee Meeting

City of East Lansing  
PLANNING, BUILDING &  
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410 Abbot Road  
East Lansing, MI 48823  
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At the January Steering Committee meeting the Committee discussed the current Goals, Objectives, and Action and a variety of other topics as they relate to transportation (both motorized and non-motorized), infrastructure, and environmental sustainability. Some of the key discussion points were as follows:

- Non-motorized connections with campus are important and need to be enhanced, especially in the core downtown and around the Trowbridge/Harrison corridors
- How do we promote rain gardens/community spaces in creative ways
- How are we implementing the ADA transition plan
- How do we further alternative fuel vehicles in the City's fleet and in the City generally
- Is it possible to incent landlords to do energy efficiency measures?
- Upgrading our street lighting and filling in gaps in the system
- Is a food waste composting facility possible?

Along with a whole list of smaller topics that Staff is looking into.

Staff has included a draft copy of the outline of the City's ADA transition plan, a summary of the "High Cost of Free Parking" article that some people might find relevant to the discussion, and the City's Non-Motorized Transportation Plan, for those that have not reviewed that important document. We will be passing along additional information regarding the City's parking system on Tuesday for discussion at the meeting next week as well. As you will recall, Staff asked you to think about motorized transportation/parking and sustainability for this meeting. If you have any questions prior to the meeting, please do not hesitate to get in touch with Staff.

**2014**

**Americans with Disabilities Act  
Transition Plan**



**DRAFT**

**February 2014**

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## **INTRODUCTION**

The purpose of this Transition Plan (the “Plan”) is to ensure that the City of East Lansing’s facilities, programs, and services which are used by the public are accessible to people with disabilities. The City of East Lansing has made a significant and long-term commitment to improving the accessibility of facilities, programs and services. This Transition Plan identifies barriers and prioritizes improvements that should to be made throughout the City. This Transition Plan also describes the existing policies, procedures, and programs that enhance the overall accessibility for persons with disabilities.

## **TRANSITION PLAN HISTORY AND OVERVIEW**

The City of East Lansing’s Transition Plan will be presented for approval by resolution of the City Council. Concurrently with the work done on the Plan, the Transition Plan Committee (the “Committee”) continues the process of self-evaluation of the City’s facilities, programs and services. A facilities’ assessment was initiated in 2011 and will be completed in 2014 (see Appendix A for list of facilities). The City continues to work on this assessment along with an initial self-evaluation of programs and services.

## **TRANSITION PLAN COMMITTEE**

A Transition Plan Committee was re-formed in 2013. The Committee is currently comprised of the following employees:

- Lori Baetz, Engineering Technician II, Dept. of Public Works
- Carlos Barajas, Facilities Manager, Dept. of Parks, Recreation, Arts, and Facilities
- Glen Dempsey, Building and Code Administrator and ADA Coordinator, Dept. of Planning, Building, and Development
- Tim Dempsey, Director, Dept. of Planning, Building, and Development
- Tim McCaffrey, Director, Dept. of Parks, Recreation, Arts, and Facilities
- Wendy Wilmers Longpre, Assistant Director, Dept. of Parks, Recreation, Arts, and Facilities

## **LEGAL REQUIREMENTS**

The federal legislation known as the American with Disabilities Act (ADA), enacted on July 26, 1990, provides comprehensive civil rights protections to persons with disabilities in the areas of employment, state and local government services, and access to public accommodations, transportation, and telecommunications.

Title II of the ADA specifically applies to state and local governments, referred to as “public entities,” and their programs, services, and facilities. Title II Article 8, requires public entities to take several steps designed to achieve compliance. The Transition Plan used to implement compliance must include, at the minimum (Article 8.3):

1. A list of the physical barriers in a public entity's facilities that limit the accessibility of its programs, activities, or services to individuals with disabilities;
2. A detailed outline of the methods to be utilized to remove these barriers and make the facilities accessible;
3. The schedule for taking the necessary steps to achieve compliance with title II. If the time period for achieving compliance is longer than one year, the plan should identify the interim steps that will be taken during each year of the transition period; and,
4. The name of the official responsible for the plan's implementation.

This Transition Plan provides a method to schedule and implement ADA required improvements to public facilities (including the public right-of-way), programs and services. Before a final transition plan can be developed, an inventory of the programs and facilities must be performed.

## **IDENTIFIED OBSTACLES IN FACILITIES, PROGRAMS AND SERVICES**

The City of East Lansing will complete a self-evaluation by using a system to identify and assess obstacles in its public facilities, programs and services. That system will initially evaluate those facilities and programs with the most public exposure and continues on with a complete review of all facilities and programs. The accessibility barriers will be identified using the *2010 Americans with Disabilities Act Standards for Accessible Design*.

### **INITIAL EVALUATION –QUESTIONNAIRE AND FACILITIES REVIEW**

The purpose of this evaluation is to obtain a comprehensive overview of the complete list of facilities, programs, and services open to the public; to determine which ones are not in compliance with the ADA Guidelines; and to get the highest priority programs and services under review and revision as soon as practical. A questionnaire will be distributed to each department for completion (see Appendix B). The programs, services, and activities questionnaire is used to evaluate the types of programs offered to the public, the location of the program, and what areas of the City's facilities are open to the public. Some of the questions to be answered include the following:

- What type of program or service is it? Informational, educational, recreational, public service or public meeting?
- How often does it take place?
- Is it currently accessible to disabled persons?
- If it is not accessible, would making it accessible significantly change the nature of the program located?

In conjunction with this questionnaire a facilities review that began in 2011 with a partial assessment of City Hall (see Appendix C) will continue to other facilities. This assessment and results from the questionnaire will determine such things as:

## **DRAFT 2/5/2014**

- Is the facility a building or outside space?
- Is the entire area open to the public?
- Does the area which is open to the public appear to be accessible?
- Is there any other location where the program or service could be offered?

Each department-specific evaluation will include a description of programs and services, a contact person, the locations of operations, and the current practices that facilitate the participation of persons with disabilities in programs and activities as well as action steps.

The Findings and Conclusions of the Initial Evaluation are as follows:  
[TO BE DETERMINED BASED ON SELD-ASSESSMENT FINDINGS]

### **DETAILED EVALUATION**

The second step in the Self-Evaluation will require staff review of the questionnaire responses. The Preliminary Evaluation Questionnaire will be completed [TBD] and will be used as a basis for identifying all of the facilities, programs, and services offered to the public, and any obvious accessibility issues associated with each. The detailed evaluation includes staff reviewing the programs and services for accessibility issues and also performing a detailed measured evaluation at the public areas of each facility.

The Detailed Evaluation of Programs and Services includes review of every department with concentration on public interaction, printed material and meetings. The recommendations are as follows:

[RECOMMENDATIONS PENDING SURVEY RESULTS]

## **REMOVING BARRIERS IN PROGRAMS AND SERVICES**

### **METHODS**

The City of East Lansing utilizes many different approaches in removing barriers in its programs and services, including proactively identifying and eliminating the barrier, responding to public complaints, as well as creating or altering programs and services which enhance accessibility for disabled persons.

### **PRIORITIES**

The City of East Lansing bases barrier removal priorities on a number of factors: special request, location, accessibility condition, type of program or service, cost effectiveness, and considerations of any substantial change or effect to the nature of the program or service.

#### **Special request**

East Lansing will attempt to give priority to any program or service where a disabled person has requested help.

**Location**

The location priority will be discussed in the section Removing Barriers from Facilities, below.

**Type of Program or Service**

East Lansing identified its programs and services priority as follows:

1. Services which provide a required governmental function for the public, either by federal, state, or local law, e.g., voting, public hearings, court functions, permitting, etc.
2. Programs with educational purposes.
3. Programs with recreational purposes.
4. The number of times per year that the specific program is offered.
5. Accommodations that would not substantially change the nature of the program or service.

**Accessibility Condition**

Using the data from the Detailed Evaluation, an accessibility condition can be determined. If the accessibility condition is extremely poor, this will elevate the level of priority when combined with the other priority factors.

**Substantial Change to Program**

After determining the accessibility of each program, the City of East Lansing will evaluate the necessary changes to comply with ADA mandated accessibility, and then determine if those changes will significantly alter the program in a manner which substantially changes the nature of the event. If it is not possible to make the program accessible without substantially changing it, the City of East Lansing will determine whether to continue offering the program or eliminating it altogether.

**Cost Effectiveness**

After the cost is determined, the cost will factor into the determination of the priority and the City of East Lansing will attempt to maximize the work accomplished for the dollars spent.

**REMOVING BARRIERS IN FACILITIES OPEN TO THE PUBLIC**

**METHODS**

The City of East Lansing utilizes many different approaches in removing barriers from its public facilities, including proactively identifying and eliminating the barrier, responding to public complaints, ensuring the appropriate design and build-out of renovations or new construction of a facility following the most recent design guidelines, as well as changing the location of its program or service in order to provide an accessible location.

**PRIORITIES**

The City of East Lansing bases barrier removal priorities on a number of factors: special requests, location, accessibility condition, and cost effectiveness.

**Special requests**

The City will give priority to any disabled persons that have requested assistance or filed a

complaint regarding lack of accessibility.

**Location**

The City identified its facilities location priority as follows:

1. Facilities, or areas within a facility, which are open to the public and support a required governmental function, as required by federal, state, or local law, e.g., voting, public hearings, court functions, permitting, etc.
2. Facilities, or areas within a facility, which are open to the public and used for educational purposes.
3. Facilities, or areas within a facility, which are open to the public and used for recreational purposes.
4. The number of times per year that facilities, or areas within a facility, are open to the public and used for educational or recreational purposes.

**Accessibility Condition**

Using the data from the Detailed Evaluation, an accessibility condition can be determined. If the accessibility condition is poor, this will elevate the level of priority when combined with the other priority factors.

**Cost Effectiveness**

After the cost is determined for each facility, barrier removal will be prioritized using the cost factors. The cost factors will attempt to maximize the work accomplished for the dollars spent.

**POLICIES**

The City of East Lansing has made an ongoing commitment to ADA compliance. By instituting various policies and procedures, as described in this Transition Plan, the City is pledging to continuously review and evaluate its programs and services, facilities, and the Transition Plan approved by resolution of the City Council.

**PUBLIC GRIEVANCE PROCESS**

The public grievance process is an integral part of the Transition Plan. Public grievances or requests may often drive the prioritization of improvements. The City's original ADA Grievance procedure was adopted on March 16, 1992 and was updated on January 3, 2014 to meet current best practices.

Any persons desiring to file a grievance or a request regarding accessibility of a program, service, or facility, may contact the ADA Coordinator in writing and describe the issue in detail, including the location. If the person filing the grievance needs assistance in providing the ADA Coordinator with a written grievance, assistance will be given upon request. The ADA Coordinator will route the information contained in the grievance to the appropriate City of East Lansing department for inspection and possible action. That department will then respond to the ADA Coordinator with its findings, and the ADA Coordinator will record the formal response and reply to the complainant or requestor. All grievances, requests and responses will be kept on file. Appendix D includes a copy

of the City of East Lansing's Grievance Procedure and supporting documents for Facilities, Programs and Services.

## **REPORTING**

East Lansing is using two methods to inform the public and city officials about the progress being made in removing barriers. The first is the ADA web page on the City of East Lansing's web site. This page will be devoted to ADA rules, plans, contact information, policies, ordinances, and reports. The second method will be an annual report on the progress of the Transition Plan to coincide with the city's fiscal year. This report will summarize accomplishments from the previous year, plans for the upcoming year and any additional challenges that need to be addressed.

## **TRAINING**

The City of East Lansing will undertake a training program to ensure that the appropriate staff members are prepared for implementation of this Transition Plan. The training program would have different levels of training based upon the level of involvement of each staff member with the Plan implementation. After the initial training, ongoing training will be provided as needed.

### **Staff Training**

Various staff members have attended the following seminars/trainings:

- [TO BE ADDED]

### **Compliance Training for Additional Affected Staff**

The City will seek opportunities for training sessions for City personnel when available and appropriate. The sessions will include topics relating to modifying programs and facilities in order to comply with ADA regulations, as well as necessary accommodation training for personnel required to have direct contact with the general public.

## **ESTIMATED COMPLIANCE COSTS**

The estimated cost for fully implementing this transition plan is \$X,XXX,000.

City facilities in particular have accessibility issues that cannot be definitively calculated without entering into the actual design and bid project phase. The estimated cost given in this section represents the total cost based upon the known noncompliance areas and the estimated cost to correct as determined by preliminary estimates, as well as comparison of costs associated with similar past projects. The estimated costs do not include any costs for training, data acquisition or data management.

## **SCHEDULE**

The City of East Lansing will make reasonable efforts to improve the accessibility of facilities, programs, and services by appropriating funding for ADA compliance through the City Council. As with all budgeting decisions, the Council will determine the appropriate amount to spend each year.

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There will be times when it is technically infeasible to provide technical compliance, or a program will be substantially changed by making it accessible for all persons. The City of East Lansing will choose areas with high priority and solvability before moving on to lower priorities unless a specific request is made by the public or aggrieved persons.

The City of East Lansing will also apply the concept of Program Access under Title II of the ADA. Program Access does not necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities, as long as the program as a whole is accessible. With that in mind, it is the intent of the City of East Lansing to use the following phased schedule as a guide for compliance:

<b>Buildings/Facilities</b>	<b>2014</b>	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>
Bailey Community Center					
City Hall/54B District Court					
East Lansing Public Library					
Family Aquatic Center & Softball Complex					
Hannah Community Center					
Orchard Street Pumphouse					
Public Works Facility					
Soccer Complex					
Valley Ct. Community Center					
Parking Garages/Lots					
Parks and Playgrounds					
Public Infrastructure - Sidewalks/Ramps					
<b>Programs and Services</b>					
Web Site					
Staff Reports and Council Documents					
Applications, Forms, Other Materials					
Expected Minimum Timeframe					
Potential Timeframe Extension					

### RESPONSIBLE INDIVIDUAL

The official responsible for the implementation of the City of East Lansing's ADA Transition Plan is:

Glen Dempsey, Building and Code Administrator, ADA Coordinator  
Email: [gdempsey@cityofeastlansing.com](mailto:gdempsey@cityofeastlansing.com)  
Phone: (517) 319-6878  
410 Abbot Road  
East Lansing, MI 48823

**PUBLIC INPUT**

The City of East Lansing provided opportunities for individuals to comment on this Transition Plan, which included:

- Electronic copies made available on the City of East Lansing’s web site
- Document copies made available at City Hall, Department of Public Works, Hannah Community Center, and the East Lansing Public Library
- Special presentation at a City Council public meeting on \_\_\_\_\_, 2014

The City of East Lansing published legal notices in the City Pulse on \_\_\_\_\_, 2014 and a story was published in the Town Courier on \_\_\_\_\_. Copies of that notice and story are attached as Attachment \_\_. Invitations were sent to all City of East Lansing Boards, Commissions and a number of special interest groups. These notices also provided instructions regarding the timetable for comments and where to send them. Public comments were accepted for a period of no less than 30 days, ending \_\_\_\_\_, 2014. Public comment form is available on Attachment \_\_.

Formal adoption of the Transition Plan is proposed to take place on \_\_\_\_\_, 2014. It will be available on the website and by written formal request to the ADA Coordinator.

## Appendix A – City Facilities

<b>Buildings (Public Programs/Services)</b>	<b>Address/Location</b>
Bailey Community Center <ul style="list-style-type: none"><li>• Childcare Program</li><li>• Meetings</li><li>• Sports &amp; Recreational Programs</li></ul>	300 Bailey
City Hall/54B District Court <ul style="list-style-type: none"><li>• Customer Service/Payments</li><li>• Meetings</li></ul>	410 Abbot/100 Linden
East Lansing Public Library <ul style="list-style-type: none"><li>• Meetings</li><li>• Patron Services</li></ul>	950 Abbot Rd.
Family Aquatic Center & Softball Complex <ul style="list-style-type: none"><li>• Various Recreational Activities</li></ul>	6400 Abbot Road
Hannah Community Center <ul style="list-style-type: none"><li>• Event Rentals</li><li>• Fitness Center</li><li>• Meetings &amp; Conferences</li><li>• Prime Time Seniors' Program</li><li>• Sports, Recreational, &amp; Cultural Programs</li><li>• Swimming Pool</li><li>• Theater Performances</li></ul>	819 Abbot Road
Orchard Street Pumpouse <ul style="list-style-type: none"><li>• Community Events</li></ul>	368 Orchard Street
Public Works Facility <ul style="list-style-type: none"><li>• Customer Service</li><li>• Self-Serve Recycling Facility</li></ul>	1800 E. State Road
Soccer Complex <ul style="list-style-type: none"><li>• Soccer Games and Tournaments</li></ul>	3700 E. Coleman Road
Valley Court Community Center <ul style="list-style-type: none"><li>• Senior Citizen Respite Care</li></ul>	201 Hillside Ct.
<b>Public Infrastructure</b>	
Sidewalks/Ramps	various

## Appendix A – City Facilities

### Parking Garages/Lots

Charles Street Garage  
Division Street Garage  
Grove Street Garage  
M.A.C. Avenue Garage  
Lot 1  
Lot 4  
Lot 7  
Lot 8  
Lot 11  
Lot 15 East (City Hall)  
Lot 15 West  
Lot 16

### Address/Location

Charles & Albert  
Division & Albert  
300 Grove St.  
333 M.A.C. Ave.  
100/200 Albert Ave.  
300 block Abbot  
126 Bailey Street  
Valley Court/Evergreen  
139 Bailey St.  
400 block Abbot  
400 block Abbot  
300 block Albert (CVS)

### Parks and Playgrounds

#### Community Parks

- Abbot Road Park
- Albert A White Memorial Park
- Bailey Park
- Burcham Road Park
- E.L. Hannah - Britton Field
- Northern Tail Dog Park
- Northern Tier Bike Trail
- Patriarche Park
- Valley Court Park

#### Neighborhood Parks

- Abbey Road
- Ashton Lakes
- Clifton Triangle
- Emerson
- Glencairn
- Harrison Meadows
- Hawk Nest
- Henry Fine

#### Mini-Parks/Playlots

- Avondale Square Linear
- Avondale Square Tot Lot
- Ehinger
- Forest
- Glenhaven
- Harrison Road
- Hidden River
- Musselman/Ledebuhr Welcome
- NF Smith (Orchard Street)
- Shaw
- Shaw Water Tower
- Stoddard
- Tamarisk
- Wolf Court

## Appendix B

# Americans with Disabilities Act Self-Evaluation Questionnaire - Program, Services, and Activities

**DEPARTMENT:**

**CONTACT PERSON:**

**PHONE:**

**E-MAIL:**

*The ADA prohibits the denial of services or benefits to persons with disabilities. In the performance of common, every day services provided by local units of government, you must ensure that all services are available in some way to persons with all disabilities. To better allow us to understand each department's interactions with the public, we request that you complete this questionnaire. Your responses are vital to ensuring that modifications can be made throughout the City to ensure access to all programs and services, if necessary. Please discuss with your staff as needed to provide thorough, complete, and accurate responses to each question. The information provided is intended to allow for changes throughout the City to provide equal access to programs and activities to everyone, without exception.*

1. What programs or services are offered in your department to the public? Please list them and also indicate the level of interaction your department has with the public (infrequent, frequent, etc.).
2. Are all programs offered by your department available to persons with disabilities noted below? Consider the unique challenge each presents to you and the person, i.e., can someone in a wheelchair see over your service counter?, how you would communicate with someone with a severe hearing loss?, etc.)
  - a. Physical challenge? (Uses a wheelchair, can't stand for long periods, etc.)
  - b. Sensory challenge? (Visual loss or hearing loss)
  - c. Cognitive challenge? (May have difficulty understanding)
3. Are programs, services or activities offered by your department the same for people with disabilities or are separate or different accommodations necessary? Explain.
4. Do any programs segregate people with disabilities from others participating in the same program service or activity?
5. Are reasonable modifications necessary to provide programs, services, and activities? If so, what are your suggestions?
6. Does your department offer any permits, licensing, or certifications to citizens (building permits, voter registration, etc.)? If YES, please list.
7. What auxiliary aids are provided for people with hearing impairments (may include: qualified interpreters, note takers, computer-aided transcription services, written materials, telephone handset amplifiers, assistive listening systems, telephones compatible with hearing aids, closed caption decoders, open and closed captioning, telecommunications devices for deaf persons (TDDs),

## Appendix B

videotext displays, and exchange of written notes) and where are they located?

8. What auxiliary aids are provided for people with visual impairments and where are they located? (e.g., qualified readers, Braille materials, large print materials, and assistance in locating items)
9. What auxiliary aids are provided for people with cognitive impairments and where are they located? (e.g., computer terminals, speech synthesizers, and communication boards)
10. Do any of the programs offered by your department have papers or documents that are given to employees or the public? Please list and include all publications.
11. Do any of the programs have any audio/visual media that is offered to employees or to the public? Please list and include information also on the City web site.
12. Do you have existing ADA policies and procedures in place for each program?
13. Has your department designated an employee to act as liaison to the City ADA Coordinator? If so, who is it? How long have they been performing this function? Have they previously attended ADA-related training?
14. Has anyone in your department had any training specific to the ADA? If so identify the staff person, who provided the training, what the topic of the training was, and the date(s) of the training.
15. Has your department had any interactions with persons with a disability? If so, identify the type of disability and the methods used to provide equal service to them.
16. Do you have any recommendations for changes that would allow your department to better serve persons with disabilities?

## Appendix C – Preliminary Building Assessment

### ADA Summary East Lansing Facilities (Preliminary Inventory)

#### City Hall

##### Door Pressures/ Push & Pull

	Door Count	Compliant Doors	Percent of Compliancy
• First Floor	87	10	11.5%
• Second Floor	95	7	7.4%
• Basement	63	1	1.6%
• Power Assisted	4	4	100.0%
• Facility Total	249	22	8.8%
• Public Accesable	50	18	36.0%

##### Door Lever/ Handles & Locks

	Door Count	Compliant Doors	Percent of Compliancy
• First Floor	89	58	65.2%
• Second Floor	95	62	65.3%
• Basement	63	30	47.6%
• Facility Total	251	150	59.8%
• Public Accesable	52	49	94.2%

#### Bathrooms

	Element	Staff or Public	Element Count	Compliant Elements	Percent of Compliancy
• First Floor	Stalls	Public	2	2	100.0%
	Water Borne Basins	Public	3	3	100.0%
	Dispensers	Public	10		
	Grab Bars	Public	2	1	50.0%
	Mirrors	Public	2	2	100.0%
	Plumbing	Public	3	0	0.0%
	Plumbing Guards	Public	3	0	0.0%
	Threshold	Public	2	2	100.0%
• Second Floor	Stalls	Public	4	4	100.0%
	Water Borne Basins	Public	4	4	100.0%
	Dispensers	Public	2	1	50.0%
	Grab Bars	Public	2	2	100.0%
	Mirrors	Public	2	2	100.0%
	Plumbing	Public	4	4	100.0%
	Plumbing Guards	Public	4	0	0.0%
	Threshold	Public	4	0	0.0%

## Appendix C – Preliminary Building Assessment

• Basement	Stalls	Staff	3	3	100.0%
	Water Borne Basins	Staff	3	2	66.7%
	Dispensers	Staff			
	Grab Bars	Staff	2	2	100.0%
	Mirrors	Staff	2	2	100.0%
	Plumbing	Staff	3	3	100.0%
	Plumbing Guards	Staff	3	0	0.0%
	Threshold	Staff	3	2	66.7%

### Drinking Fountains

		Count	Compliant	Percent of Compliance
• First Floor		2	0	0.0%
• Second Floor		2	0	0.0%
• Basement		1	1	100.0%

### Ramps/ Exterior

	Staff or Public	Count	Compliant	Percent of Compliance
• City Hall East Entry	Staff	1	0	0.0%
• City Hall Main Entry	Public	1	0	0.0%
• 54B Entry	Public	1	1	100.0%
• Police Entry	Public	0	0	NA

### Signage

# *The High Cost of Free Parking*

By Donald Shoup

Summarized by  
**Tri-State Transportation Campaign**  
350 W 31<sup>st</sup> Street, New York, NY 10001  
p: (212) 268-7474 f: (212) 268-7333  
www.tstc.org

The matter of parking is largely taken for granted, until you're circling the block looking for that elusive space. Even for many transportation professionals and urban planners, parking tends to be little more than an afterthought. But a major new treatise by UCLA professor **Donald Shoup** makes a strong case for more attention to parking. Shoup determines that in the United States, off-street parking consumes an area roughly the size of Connecticut. If global car ownership rates catch up with those in the U.S., and assuming just one off-street space per car, an area the size of England would need to be paved to house the world's car fleet (during the 95 percent of the day when it's not on the road).

Shoup contends that many of the woes associated with America's car culture can be linked directly to the lack of rational attention to parking. More specifically, he argues that the **oversupply of free parking** (he estimates 99 percent of parking in the U.S. is free) is an enormous public subsidy that makes driving less expensive than it should be, further skewing travel choices. In fact, transportation suffers from the same "tragedy of the commons" relative to parking observed with regard to fisheries and other free and un-owned resources. Zoning requirements for overly-abundant off-street parking and failure to charge appropriately for curb parking result in extra air pollution, higher oil consumption, traffic congestion, and sprawl.

Less obviously, **parking requirements increase the cost of housing, as well as goods and services**. For urban areas, Shoup summarizes these effects quoting Mumford: "The right to have access to every building in the city by private motorcar in an age when everyone possesses such a vehicle, is actually the right to destroy the city."

For those who don't have the time to read *The High Cost of Free Parking's* hefty 700 pages, we have summarized Shoup's major findings into three sections following the outline of his book: zoning codes' influence on the proliferation of free parking, the cruising-for-parking phenomenon, and Shoup's policy recommendations.

## **The Problem With Zoning**

According to the American Planning Association, cities set parking requirements for at least 662 different land uses – everything from "adult entertainment" establishments to nunneries (e.g. 1 space per patron, plus 1 space per employee on the largest working shift for adult entertainment and 1 space per 10 nuns for the nunnery). Shoup says the requirements are often simply pulled

out of thin air. There are two primary sources for these requirements: the parking requirements of neighboring communities and the Institute of Transportation Engineers' (ITE) *Parking Generation* manual. Both sources are problematic, but the second is all the more troubling in its faults because it purports to be scientific.

*Parking Generation* recommends the exact number of parking spaces needed per square foot for dozens of different land uses, and supports those figures with scatter plots and studies. But Shoup shows that the recommendations are in fact derived from far too few studies to be reliable. Half of the parking generation rates are based on four or fewer studies and 22 percent are based on a single study. But even if an adequate number of studies had been analyzed, the rates would still be skewed high because nearly all of the studies examine the demand for *free* parking during times of peak demand in suburban locations with few, if any, alternatives to driving. Shoup compares this to the demand for free pizza. The slices go a lot more quickly if they are free than if they are sold at an appropriate price.

Shoup says “city planners sometimes mistake Pandora’s box for a toolkit.” With the best of intentions, planners have “cured” parking shortages with a tonic that has made matters worse. The practice of setting off-street parking requirements in city zoning codes has become fully entrenched. Even for low-income housing projects where a majority of residents can’t afford a private vehicle, zoning codes require vast parking lots to meet a demand that will never materialize. Those lots not only add to the cost of a development, they also require that land which could otherwise be used for housing (or landscaping, etc). Overall, parking requirements increase the cost and diminish the supply of housing, and this effect is not limited just to low-income developments. A San Francisco study found that requirements for off-street parking increased housing prices by an average of \$47,000 and increased the household income necessary to purchase a house from \$67,000 annually to \$76,000.

Shoup calculates that parking requirements impose a public subsidy for drivers that came to at least \$127 billion in 2002 (total annual land, capital and operating costs of U.S. off-street parking) and may be closer to \$374 billion. For comparison, in 2002 federal Medicare spending was \$231 billion and for the military was \$349 billion. Shoup calculates that the value of off-street parking, at approximately \$12,000 per vehicle, roughly equals the total capital cost of all vehicles plus all roads in the U.S..

On a per-mile driven basis, the subsidy for parking amounts to between 5 and 14 cents. Shoup calculates that gasoline taxes would have to be raised by \$1.27 to \$3.74 per gallon to offset this subsidy, and notes that charging appropriately for parking may be as, or even more effective, not to mention technologically simpler, than other pricing techniques aimed at reducing driving. He cites a study of Boston finds that a \$1 parking surcharge would roughly double the average traffic speed in the central business district, the same benefit that would result from a \$1 congestion fee.

Although part three of *The High Cost of Free Parking* is dedicated to Shoup’s recommendations, in part one he discusses two solutions which could be implemented relatively easily in the near term: **fees in lieu of parking requirements**, and offering developers the option to **reduce travel demand** as an alternative to building a portion of required parking. Fees in lieu of parking

requirements allow cities to collect funds from developers to build shared parking facilities. The idea has significant benefits for urban design, largely because it would consolidate parking rather than requiring each establishment to provide a separate lot. Further, because different land uses require parking during different times of the day, a smaller amount of parking can be shared among several establishments.

The second solution, reducing demand, offers developers a cost-effective alternative to building more parking. Shoup suggests that employers or developers can offer “eco-passes” as a way to encourage transit use, walking, or bicycling instead of driving. Other demand reduction options are “cash-out parking” (a travel demand management technique which Shoup conceived of years ago) whereby employers offer workers cash in lieu of a free parking space (the employee can spend it to park, or pocket it if another commuting means is available) and car-sharing. Beyond the obvious benefit of diminishing the need for parking and freeing up land for higher end uses, this approach reduces vehicle trips, cutting air pollution, lowering oil consumption, and easing congestion.

### **Cruising for Parking**

Parking has been getting attention recently in New York City. First was the July city council vote to make parking free on Sundays and Mayor Bloomberg’s subsequent veto. In August, some city parking meters began accepting parking cards for payment. Meanwhile, the Tri-State Campaign and some Bronx groups have expressed concern over plans to build thousands of additional parking spaces around Yankee Stadium, a change which will encourage more fans to drive.

In Part 2 of his book, Professor Shoup explores the trials and tribulations of cruising for free curb parking. This is an experience car-owning New Yorkers, facing alternate-side-of-the-street rules, not to mention visitors to the city, are very familiar with. Shoup asserts that cruising for parking is much more than just run-of-the-mill aggravation. In fact, **cruising for parking results in a tremendous amount of excess driving** and all of its concomitant ills — air pollution, crashes and traffic congestion.

Because it is available to drivers on a “first-come, first-served” basis, free parking suffers the problem of communal ownership. Once drivers secure a space, they have no incentive to give it up in a timely fashion.

Based on review of 16 mostly American and European studies of cruising conducted between 1927 and 2001, Shoup concludes that cars searching for free parking contribute to **over 8% of total traffic**. The relevant New York City study was conducted in 1995 by John Falocchio, Joe Darsin and Elena Prassas. They concluded the average time drivers took to find a curb space between 8 and 10 a.m. was 7.3 minutes, increasing to 10.6 minutes between 11 a.m. and 2 p.m. According to their research, cruising for curb parking created about 8 percent of the total vehicle miles traveled in west Midtown.

Shoup has developed a model to explain why a driver would choose to cruise for free curb parking rather than pay for off-street parking (interested readers can turn to page 323 of his book

for the equation). He says the decision to seek free parking is based on the price of off-street parking, the amount of time a driver intends to park for, the time spent searching, the cost of gas burned while cruising, the number of people in the car, and the value of the driver and his passengers' time. If the cost of off-street parking outweighs all of those other variables, the driver will cruise for parking at the curb.

Some will likely disagree that all time-wasting, gridlock-contributing motorists indulge in such an involved calculus, but it at least provides a baseline for how some drivers may approach parking.

The most compelling chapter in this section examines the impacts of cruising for parking. Shoup uses UCLA's Westwood Village and its backwards pricing policy as his example. Westwood has plenty of moderately priced off-street parking available, but metered curb spaces are **free in the evening** when the district sees its highest traffic levels.

Shoup and his assistants conducted 160 park-and-visit tests by bicycle and found that the average search time for parking is 3.3 minutes for all times, but is **nearly 10 minutes during evening hours**. The average search time of 3.3 minutes may seem insignificant, but added up across all of Westwood's drivers, it amounts to 426 hours per day (a little more than 10 work weeks).

Shoup found that the average distance driven while cruising for a free parking space in Westwood was half a mile. Added across all cruising drivers, the behavior contributes 3,600 vehicle miles traveled in the district each day. Over the year, that totals 945,000 extra miles traveled, or **two round trips to the moon**, using 47,000 gallons of gasoline and producing 728 tons of CO<sub>2</sub>. The cumulative impact of cruising across all commercial districts in the U.S. is obviously far higher.

Beyond zoning requirements that cause overbuilding of off-street parking, many areas deal with parking shortages by setting time limits. These are ineffective because drivers routinely violate the rules. (A Seattle survey found the average parking duration in 1-hour spots was 2.1 hours.) Some areas have explored providing information measures to broadcast locations of available parking.

But Shoup asserts that the most appropriate way for cities to address curbside parking shortages is to **price the spaces** – he says that would result in 14 percent (about 1 in 7) of spaces being open. Like congestion pricing schemes, rates could vary throughout the day depending on demand (enabled by new technology like NYC's muni-meters).

But pricing free curbside parking isn't rocket science. Indeed, the parking meter, first introduced in Oklahoma in 1935, is the obvious example. Shoup suggests political hurdles to introducing or hiking prices can be overcome by shifting responsibility for setting rates from politicians to bureaucrats, though this may seem to be a fairly ivory-tower, or at least Californian, point of view.

## **Shoup's Parking Policy Recommendations**

In the third and final section of his opus, *The High Cost of Free Parking*, UCLA Professor Donald Shoup identifies ways to overcome technological and political barriers in the way of charging market-priced rates for parking.

The first obstacle is relatively easy to address. Shoup describes several new takes on the traditional parking meter, which was invented by a member of the Oklahoma City Chamber of Commerce in 1935. Most American parking meters haven't changed much in the 70 years since. But recent years have seen significant advances.

**Pay-and-display** and **pay-by-space meters** are used in New York City, Aspen and Berkeley and differ from traditional meters in that they control multiple spaces. They also have the benefit of allowing cash, credit card, smart card and even cell phone payments. Personal in-vehicle meters, also employed by Aspen and in Arlington, VA, allow parkers to pay without stepping out of their cars. Drivers key the appropriate parking zone, insert their parking smart card, and display the meter in the windshield. Payment is deducted until the driver returns and switches off the meter. In several European cities, drivers pay for parking with their cell phones by calling a city parking number and keying in license plate and parking zone (cell payment is also a popular way to pay London's congestion charge). An in-vehicle transponder allows control officers to determine if the car is paying and parked legally. The EU is also exploring using Global Positioning System satellites to pay for parking.

Beyond their convenience, the principal advantages of modern payment methods is that parking rates can be adjusted to respond to demand. During peak parking periods, rates can be adjusted upward to ensure a rough balance between supply and demand, reducing some trips and also cutting back on cruising for parking.

Of course the **bigger obstacle to charging for parking** (evident in the recent tempest over NYC metered Sunday parking) **is politics**. Resistance to increasing parking rates and putting a price on previously free parking is strong. Shoup says it can be overcome via **parking benefit districts**.

Under such a plan, the district would receive some or all of parking revenue, rather than see it disappear into a city's general fund coffers. The district would use the funds for transportation and community improvements such as sidewalk cleaning, landscaping, storefront facades, bicycle and walking paths, etc. The establishment of parking benefit districts helps make metered parking more palatable to curbside shop owners and residents. Both groups can see a clear link between the coins deposited in parking meters and improvements in their districts.

Two southern California cities currently employ parking benefit districts: **Old Pasadena** and **San Diego**. Old Pasadena's Parking Meter Zone (PMZ) brought in \$1.3 million in 2001 and helped transform a dying commercial district into a vibrant and popular destination for shoppers and diners. The PMZ chair credits parking revenue for turning Old Pasadena around, saying, "This might seem silly to some people, but if not for our parking meters, it's hard to imagine that we'd have the kind of success we're enjoying. They've made a huge difference. At first it was a

struggle to get people to agree with the meters. But when we figured out that the money would stay here, that the money would be used to improve the amenities, it was an easy sell.”

San Diego returns 45 percent of parking meter revenues (amounting to almost \$2.2 million in 2002) to three Parking Meter Districts. An Uptown District uses its funds to revitalize commercial streets, improve the walking environment, establish focal points for transit services and increase off-street parking. San Diego’s meters carry the mantra: “Small Change for Big Changes.”

In residential areas, concerns about charging for curb parking can be ameliorated by giving residents the right to park for free. In this way, only “outsiders” are paying for parking, and their contributions go toward improving the neighborhood.

NYC recently introduced new parking meters which accept pre-paid smart cards for payment. This makes parking more convenient. But unfortunately, peak premiums seem a distant prospect while NYCDOT promotes **cheap and easy curb parking**. A new ad on its website invites Manhattan motoring: “Driving to the Theater District? Use On-Street Parking – Only \$2.00 per hour.”

That said, Mayor Bloomberg, in announcing the new meters, noted that the new technology could allow DOT to one day charge variable, demand-driven parking rates.