

## **May 6, 2015 Comments regarding**

### **P&Z Plan of Conservation & Development**

Hello, my name is Keith Richey and I am Chairman of the Parking Commission. I met with Glenn Chalder of Planimetrics and many of the Plan's observations regarding parking reflect those discussions. It follows that I endorse most of the recommendations and commentary. I will try to only comment on those matters in the Plan pertaining to parking on pages 31 to 37 which deserve further comment and clarification.

#### **2007 Downtown Study**

Starting on page 31, the POCD notes that the 2007 Downtown Parking Study prepared by Fitzgerald and Halliday found a parking deficit in both the downtown and at the train station. Then there is a list of general and obvious strategies.

#### **Recommendation for a Parking Review**

On page 32, the POCD recommends a Parking Review. In my experience, "reviews" or "studies" are a cop out to delay taking action. As I will explain in detail later in my remarks, we do not need another study - - we need to take some action.

The POCD says that this study will be different because it will focus on the dynamics of parking in downtown. The previous reports and studies covered most of the relevant issues and the Parking Commission and in the Parking Department are long observant in the parking dynamics in downtown New Canaan. And I bet many of you know some of the dynamics of downtown parking as well. Here are some of the downtown dynamics:

#### **DOWNTOWN PARKING DYNAMICS**

We have a chronic problem of employees working in retail establishments on Main and Elm parking on Main and Elm instead of parking in the nearby municipal parking lots. This takes up much of the on-street parking. We have tried to deal with this by offering a bargain parking permit for the Center Lot, which is behind the Library. That idea worked well but it seems that the benefit has reached "saturation". We also try to limit employee parking on Main and Elm by the time allowed for parking on Main & Elm and applying stiffer enforcement of the rules to repeat violators.

We know that New Canaan residents like to park on Main & Elm near the establishments that they are patronizing. They will complain about a shortage of parking even when there are empty spots in the Park Street lot (behind the Movie Theatre) and in Morse Court (behind the Mobil Station). On weekends, parking at the

Railroad Station and the Park Street Lot is free yet few are willing to park there and walk the short distance to Elm Street. The same goes for the Locust Lot which also goes underutilized on most weekend days.

We don't charge for parking on Main and Elm Streets but we do charge for parking in the municipal lots. We agree, as a matter of principal, that this is illogical but it is in keeping with the character of New Canaan. My understanding is that there used to be individual parking meters on Main and Elm and town deliberately removed them. We note that many other towns, for example, Rye, have exactly the same set up, with free parking on the main street and metered parking in the parking lots behind the stores, and it works out very nicely there and it usually works out nicely here.

Also, as a practical matter, please note that individual parking meters are largely obsolete these days because they are expensive to buy, only take coins, are easily tampered with, are unreliable, and require lots of costly maintenance. Large parking meters like you see in our municipal lots are the current technology – these are known as “Iron Mikes”. Do we really want the big “Iron Mikes” on Main and Elm? Whose store would you put them in front of? Also, please note that if we metered Main and Elm, this would require standard size parking spaces to be marked which may cause the town to lose parking spaces. In New Canaan, there are Suburbans and mini's vying for parking spaces – one size does not fit all. Taking everything into account, most members of the Parking Commission are against putting meters back on Main and Elm as a practical matter. We are happy to have this discussion, but the “devil is in the details”.

During normal business hours, other than at the most busy times during the Christmas shopping season and a six-week stretch from May until the third week of June, there is usually parking available on Main, Elm, Forest area or in the Park, Locust, Morse Court, or Center municipal parking lots if one looks a bit and is willing to walk a block or two.

Over the years, we have tried to fine-tune the amount of time that people can park on Main and Elm for several reasons. First, we want to discourage local employees from moving their cars around all day, clogging up the customer parking on Main and Elm. Second, while we want folks to have time to do errands and have lunch, we want long-term parkers to park in the municipal lots, and we certainly don't want people parking their cars there and thinking that they can park on the street and take the train to New York.

### **Parking Supervision**

The Parking Department and the Police Department jointly supervise downtown traffic and can issue parking tickets. The Police Commission has authority over on-street parking. The Parking Commission only has authority over off-street parking (which includes permits). Generally, I think that the Parking Department and the Police

Department do an excellent job of supervising parking and traffic conditions on Main and Elm. Accidents are very rare and there is ongoing ebb and flow of people parking, leaving, and parking spaces being used over and over again. Traffic generally circulates fairly well. And there may be a calming effect that results from having enough congestion to slow cars down while giving them plenty to look at.

### **Handicapped Spaces**

We have deliberately tried to limit the number of handicapped parking spaces on Main and Elm because once an area is so designated, it inevitably is under-utilized and we can't afford to under utilize parking on Main and Elm. So our policy is to enforce the handicapped rules strictly, to make sure that only people with handicapped permits are using those lots so that they are available for those who need them and who qualify. We have received virtually no complaints regarding this policy.

### **Deliveries and Loading Zones**

We have a loading and unloading problem which is chronic and results from a factors which we have little control over:

First, there is no back alley behind most of the establishments on Main and Elm that can be used for deliveries. Consequently, trucks have to park on the street to unload. Since there are often cars parked on the street, the trucks are forced to double park. This can cause obstacles to traffic and dangerous conditions. We have looked at creating a rule that all deliveries would have to completed before, say, 11 AM. The problem is that New Canaan is not big enough to make such a rule and have it stick. We are off the beaten path and deliveries to New Canaan are fit into a truck's Fairfield County delivery schedule that usually centered around the bigger towns that have on 95, for example, Greenwich, Westport, Stamford, Norwalk and Darien. We are a small fish in the delivery sea.

We have looked at the creation of more loading zones. There is the same trade-off as with handicapped spots – you immediately lose these areas for normal parking and the area is underutilized. Even where we have loading zones, they are seldom used and have not worked very well. Truck drivers want and need to park immediately in front of the establishment that they are delivering to – they won't use a loading zone that is on the other side of the street, or down the block, or catty-corner. Please note that one cannot place a loading zone anywhere, it has to have good access and that takes a special location or lots of space (which we can't afford to give up on Main and Elm).

After watching the deliveries taking place for over years, I have come to respect the speed and efficiency which most truck drivers make their deliveries. They get in and out quickly and it is actually rare when they create any significant parking or traffic problem.

When this does happen, they get warned or ticketed and learn their lesson pretty quickly.

### **Parking at Night**

At night, New Canaan has become a restaurant destination for many out-of-towners as well as NewCanaanites, of course. With the narrowing of Forest Street and its ongoing development, coupled with the construction at Town Hall, this has put pressure on parking in the area and, again, few seem to be willing to park in the Locust Lot, the Park Street Lot, or the Railroad Lot and walk a few blocks to their restaurant. Fortunately, many non-Magic Circle establishments have parking which becomes available at night and this satisfies much of the parking requirements. This dual use is one reason why we in the Parking Commission get so upset when Planning & Zoning waives the requirement for developers to provide the regulatory required parking, but I will get into that more later.

### **Commuter Parking**

I am going to move now to Commuter parking, which is an entirely different animal from daily and nightly Commercial parking. To clarify terminology, Commuter parking is parking for people taking the train. Commuters are the life blood of New Canaan. They earn the income which drives housing prices, pay taxes, and makes retail shops and restaurants go. New Canaan's unique position as a MetroNorth terminus means that a train is usually waiting when you arrive at the New Canaan station so there is no worry about getting a seat. On the way home from New York City, if you are on a direct train, you can fall asleep in New York and wake up in New Canaan, you can't oversleep your stop. Commuting time is around an hour. It is a wonderful way to commute and New Canaan is well referred to as the "Next Station to Heaven".

In New Canaan, we have three fully devoted Commuter Parking Lots; the Railroad Station lot, including the Lumberyard Lot, the Richmond Hill Lot, and the Talmadge Hill lots. We also grant a few spots in the Park Street Lot, as circumstances permit. You might be surprised to know that many years ago both the Locust Lot was also used as a commuter lot.

We only sell parking permits to town residents. There is a strict policy of selling permits on a first-come, first served basis, with a right to perpetual renewal, that is set out in the Town code. The amount that we charge for parking permits depends on desirability. We have adopted the License Plate Reader technology so that parking permits are no longer physical, there is no medallion or paper permit. License plates are registered and an officer driving through the lots with a License Plate Reader instantly knows which cars have valid permits and which do not.

The Iron Mike meters all take credit cards as well as cash. We also have an app available so that you can use your credit card to pay for a metered spot when you are in the train and on your way to the city. As noted on page 33 of the POCD, the revenue from the meters in the state-owned parking area is placed in a "Railroad Fund" which can only be used to maintain the train station lots.

Limited Daily passes are also available.

All of the Commuter lots are highly utilized and permits are double sold. The Railroad Lot is considered the most desirable, we charge the most for parking permits for that lot, and we double sell permits for that lot. However, there is still around a 1000 people waiting for a permit to park in that lot, which is equivalent to a six or seven year waiting list. There is no question in my mind that if we had more parking near the train station, it would help make New Canaan even more desirable and help property values.

Please note that our commuter parking situation is different than most other towns in this region in that, apart from the parking area immediately around the New Canaan Railroad Station, the town of New Canaan owns the lots. That is, the Lumberyard Lot, the Richmond Hill Lot, and the Talmadge Hill Lots were purchased by New Canaan and are owned by the town. In Greenwich, Darien, and most other train stops, the state owns the land used for parking and provides it to the towns for free. We don't have that luxury. We have had to pay for these desirable lots and therefore need to recover that cost by collecting permit and meter parking fees.

Karen Miller and I and some other members of the Parking Commission have attended occasional meeting of the South Western Regional Planning Agency, better known as SWRPA. SWRPA is a state agency that focuses on inter-municipal issues, particularly transportation. SWRPA has looked at our practices and has praised our high level of usage and optimization.

### **Parking Revenue**

It has been a frustration to me and those on the Parking Commission that our recommendations for the acquisition of parking facilities has to vie with other initiatives or needed spending, such as the Saxe auditorium on the same basis. Parking is a revenue generator, this is well known but it seems to be forgotten everything that the Board of Selectmen or Board of Finance has to decide on the priority of competing spending projects.

As noted on Page 33 of the POCD, Parking generates revenue of over \$1.1 million that goes into the General Fund. Thus, if Parking Revenue were keep out of the General Fund and used for Parking – as it is in Greenwich and other communities – Parking Revenue would pay for the entire proposed Locust Lot expansion in less than three

years. We could also tier the Lumberyard Lot and pay for that out of Parking Revenue in 3 or 4 years. This does not even count the incremental Parking Revenue that new parking brings in.

For this reason, the Parking Commission began recommending the creation of a Parking Fund from Parking Revenue, which would be used to fund the acquisition of parking facilities, as well as other parking expenditures. We had to settle for a sort of fictional Parking Fund where the revenue from increases in Parking Permit fees is theoretically placed. Also, as you well know, funds from your Pay-in-Lieu of Parking Space go into this theoretical fund. But, since the funds still sit in the General Fund, the Parking Fund has been a failure in terms of changing the way the Town compares spending for Parking facilities as opposed to, for example, educational facilities. Again, Parking generates revenue so spending on it can be and, in effect already is, financed by Parking Revenue. Therefore, it should be viewed differently than other worthwhile projects that are not revenue generating.

### **Signage**

On the bottom of Page 32 regarding how to provide “way-finding” to the municipal parking lots, we agree that the signage to the municipal parking lots should be improved. Some improvements have been made, but we can certainly go to Public Works again to request that they explore additional signage.

### **Cross Street Area Redistricting.**

We believe that there should be no change to the current rules regarding the number of parking spaces required for each real estate development in this area. There is no excess parking in this area and new development without accompanying adequate new parking spaces may create a serious parking shortage. We agree with the language of the plan on page 41 which suggests allowing builders to make the ground floor for parking to minimize the land area utilized for surface parking.

On page 33 and 34 of the POCD, we certainly agree with the recommendation to put in parking structures in the Locust Avenue Parking Lot and the Lumberyard lot at the train station inasmuch as I gave these recommendations to Mr. Chalder and that is probably why they are reflected in the POCD. The PC has been recommending tiering the Locust Lot and the RR/Lumberyard Lot at least since 2005. We made these recommendations in writing to the Planning and Zoning Commission and the Board of Selectmen in writing every year. Sadly, the Board of Selectmen has not done a thing, there is no mystery about this – these projects would improve the immediate and long

term commercial and commuter parking situation in New Canaan. They should have been done and they should be done now. We don't need a study to know that.

On page 34 and elsewhere, the Plan suggests that adding parking in the Train station would help the downtown situation but that is not really true if we use the term "downtown parking" to refer to commercial parking, not commuter parking, which I do. During weekends there is already plenty of free available parking at the train station but people are not willing to walk from there to establishments on Main and Elm. Perhaps if we had an education program of some sort – we might consider trying that but I am not certain how that work work or whether it would work. Adding parking to the Train station lot would not help downtown commercial parking on weekdays because the lot is entire used by commuters and the lot is almost triple sold and we have a seven year waiting list. Of course, it would help the commuter parking situation greatly.

It should also be noted that parking structures are expensive, with each incremental spot costing at least \$30,000 and more than \$50,000 if one take the land costs into account. For example, the last plan to tier the Locust Lot indicated that there would be 239 spaces after tiering and that the cost of tiering the Locust Lot would be approximately \$3 million. Because there are already 150 spots in the Locust Lot, in effect we would be paying \$3 million for 89 additional parking spots. Thus, the cost per additional parking space would be \$33,707. These figures illustrate the disservice to the Town that occurs when a developer is allowed to waive forever the obligation to provide a parking space for \$7,500 under the pay-in-lieu of program. We don't disagree with the idea in principle, but the amount charged for each foregone parking space should be \$30-50 thousand dollars. We hope that the new rules will be rescinded or amended to reflect the true cost of providing a parking space for eternity.

### **Set-backs**

We agree with the point made on pages 36 to 37 that Main and Elm are pedestrian friendly because establishments are next to the sidewalk - there is no set-back. The paradox is that the Main and Elm area is so desirable because once people do get out and walk a bit from store to store, restaurant to restaurant, salon to barber shop, etc. , they enjoy it. However, the Plan fails to acknowledge that having no set-backs is only possible on Main and Elm because of the existence of ample on-street parking and parking immediately behind the retail stores in the Park Street, Morse Court, and Locust Lots and the lots that are privately owned such as behind some of the banks. I have to take issue with the Plan's implicit suggestion that other areas of town could be developed without setbacks and this would work - unless adequate parking is provided nearby.

### **Previous Parking Commission Recommendations**

In accordance with Section C 10-5(2) and (6) of the Code of the Town of New Canaan, the Parking Commission is to prepare and submit to the Board of Selectmen and to the Planning and Zoning Commission plans for the provision of off-street parking facilities and to recommend acquisition of land by purchase or lease for off-street parking by the 15th day of November each year.

In compliance with this requirement and to express other important considerations, for at least the past ten years the Parking Commission has recommended tiering the Locust Lot and the Lumberyard Lot.

### **Locust Lot**

We foresee a continuing shortage of Commercial parking spaces in the Main/Locust/Forest area which is likely to become worse once Town Hall is completed and its employees and visitors return. Plus there are the developments on Forest Street and the proposed development for the Post Office on Locust itself. To alleviate this, the Locust Lot should be tiered coupled with the transfer of parking of some or all Town Hall employees into the proposed parking structure. The plans for this project should be completed and agreed as soon as possible so that we will be ready to turn this over to a contractor as soon as the Town Hall Project is completed (if not sooner).

### **Lumberyard Lot.**

New Canaan's commuter lots are of tremendous value to the town by allowing people to work in Manhattan, yet live here, boosting property values and economic activity. In light of the rising demand for commuter parking, a tiered structure at the RR/Lumberyard Lot should be constructed to accommodate more commuter parking. There is a seven year wait for permits to park in this lot with over 1000 residents on the waiting list, and there are waiting lists for permits for the other less-desirable commuter parking lots as well (Richmond Hill and Talmadge Hill). Virtually every study has recognized New Canaan's need for more commuter parking and has recommending tiering the Lumberyard Lot since its acquisition. Please note that the continuing development on Pine Street near Grove (Zumbachs area) has created a tight parking situation there and growing demand.

The Parking Commission has been making these recommendations to the Board of Selectmen and Planning and Zoning Commission each year for years. In all the years that I have been on the Parking Commission, I think that only two recommendations have ever been accepted, expanding the Talmadge Hill parking lot to use land purchased for that 20 years before and to establish the parking fund. This suggests to me that we don't need another study to tell us what we already know, we just need to implement the mostly obvious solutions that have been recommended for years.



## **Parking Review**

Now let's go back to the recommendation for a Parking Review stated on Page 32. There have been many studies, reports and reviews. There is a wonderful report called "THE NEW CANAAN PARKING PROBLEM" written by the Board of Selectmen in December, 1964 which was written in response to what was considered a critical parking shortage and the Board of Selectmen recommended tiering the lot behind town hall all the way to Park Street. There is the 'NEW CANAAN BUSINESS DISTRICT PARKING STUDY' prepared by DKS Associates for P&Z in November 1996. It acknowledged the parking deficit and recommended that the town acquire and build additional parking next to the train station. Next chronologically is the TOWN OF NEW CANAAN BUSINESS DISTRICT PARKING & TRAFFIC STUDY" prepared by Earth Tech for the Town of New Canaan in May 2002. Earth Tech recommended tiering the Lumberyard lot, expanding the Richmond Hill Lot, decking the downtown municipal lots, including the Playhouse, Town Hall, Park Street and Morse Court Lot and expanding the Locust Avenue Lot and the Talmadge Hill Lot. Later in 2002, there was a PARKING FACILITIES COMMITTEE" which recommended expanding the Talmadge Parking Lot and tiering the Lumberyard Lot. In July 2007 we had the "DOWNTOWN PLANNING STUDY" prepared by Fitzgerald & Halliday which recommended putting meters on Main & Elm Streets and constructing a parking structure at the Lumberyard Lot, as well as other minor suggestions. This was closely followed in October 2007 by the "DOWNTOWN NEW CANAAN STRATEGIC PLAN" also prepared by Fitzgerald & Halliday which again noted a shortage of parking and reiterated the same recommendations as its DOWNTOWN PLANNING STUDY. In October 2011 we had the "NEW CANAAN LONG RANGE PLANNING MUNICIPAL AND PUBLIC USE FACILITIES MASTER PLAN" prepared by Perkins Eastman which mostly focused on the need to rehabilitate Town Hall but recommended that the Lumberyard or Locust Avenue Lots should be decked to provide needed spaces as a result of the Town Hall expansion. Then there was the 2013 PLAN OF CONSERVATION & DEVELOPMENT prepared by Planimetrics for your commission which recommends tiering both the Locust Lot and the Lumberyard Lot. The 2013 Plan morphed into the "NEW CANAAN 2014 PLAN OF CONSERVATION & DEVELOPMENT STRATEGIC ELEMENT" also prepared by Planimetrics which recommends on Page 33 that the Locust Avenue Lot be tiered and that the Lumberyard Lot be tiered..

Do you notice what all of these studies and reports have in common? They all acknowledged the shortage of parking in New Canaan, both for commercial parking and commuter parking, and everyone recommended tiering either or both the Lumberyard Parking Lot, the Locust Avenue Parking Lot, the Park Street Lot, or expanding the Talmadge Hill Parking Lot (before that was done).

Do you notice anything else in common about the recommendations of these studies? None were implemented, with the exception of expanding the Talmadge Hill lot which was done after around ten years of pushing by the Parking Commission. The Talmadge Hill expansion was done on land that had been acquired by the town for that purpose around 30 years ago and sat fallow for 20 years before the town acted. That land was finally asphalted, lighted, given drainage, and lovely landscaping a few years ago at a cost of around \$300,000 and has been fully utilized ever since. It has improved commuter parking materially, while generating incremental parking revenue.

Looking at all of these studies, it becomes clear that for over 50 years New Canaan has acknowledged that it has a commercial and commuter parking shortage and, since the acquisition of the Lumberyard Lot, the town has known that it would improve the Commuter parking situation to tier the Lumberyard Lot and, for the past five years, it has been acknowledged that tiering the Locust Lot would improve the Commercial parking situation. Both lots fall away from the street so a single tier could be added at street level, negating any serious concern about having an ugly parking structure (a concern I share by the way). There is little controversy over the conclusion. There is no need for another study to tell us this would materially improve the situation.

If there is anything you take away from my remarks, it is that we need to tier the Locust Avenue Parking Lot and the Railroad Station Lumberyard Lot now – not years from now.

Thank you for this opportunity to comment of the Plan of Conservation and Development and to state my views.

If there are any questions, I am happy to take them.