City of Los Angeles Parking Management Ordinance

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ABSTRACT

The process by which the Los Angeles parking management ordinance was developed and implemented is documented and an assessment of reasons for its lack of use is offered. The ordinance was adopted in April 1983 as a result of a federally sponsored parking study conducted by the city in 1980 and 1981. Under the provisions of the ordinance, developers can reduce code-required parking up to 40 percent on site and up to 25 percent for remote parking in exchange for the promotion of commute alternatives at the development. The landowner must (a) reserve land for added parking if it turns out to be needed and (b) record a covenant running with the land for future owners to maintain specified compliance levels or to develop additional parking spaces. Only one serious inquiry about use of the ordinance has yet been received by the city of Los Angeles. Several possible reasons for nonuse of the ordinance, which may have relevance to other cities considering such measures, were offered by developers and city staff: (a) the low level of minimum parking already required; (b) lenders' fear that overreducing parking would lessen marketability of a property; (c) lack of familiarity with the ordinance by developers (due in part to lack of city resources for publicizing the ordinance); and (d) restrictive provisions of the ordinance protecting the city, especially land set-asides and covenants. Two other reasons mentioned for nonuse of the ordinance are probably relevant only to large cities: (a) delays of 3 to 9 months in obtaining conditional use permits under the ordinance and (b) diffusion of responsibility for the ordinance among different city departments.

Effective April 20, 1983, the city of Los Angeles adopted a parking management (PM) ordinance the purpose of which is to grant land developers reduced employee parking requirements in exchange for successful encouragement of commute alternatives that would lessen parking demand at the site. The ultimate aim of this ordinance is to reduce motor vehicle emissions through the mitigation of commuter traffic, although traffic mitigation itself was regarded as a worthwhile aim as well. The ordinance was the result of a detailed city-managed study, in 1980 and 1981, that was financed by a grant from the Service and Methods Demonstration (SMD) program of the Urban Mass Transportation Administration, U.S. Department of Transportation.

The purpose of this paper is to document the process by which the Los Angeles parking management ordinance was developed and implemented, emphasizing the features of the adopted ordinance and reasons for its nonuse by developers up to the present time. The staff study report for the parking management program (1) is heavily drawn on.

BACKGROUND

Parking Management

There have been a number of new ventures into urban traffic mitigation and parking management within the past 5 years. Most of these ventures are documented in two recent reports on parking management ordinances and other traffic mitigation measures (2,3). The more extensive documentation of the Los Angeles study process discussed in this paper provides insight into the range of conditions that can affect the feasibility of a parking management ordinance. Following this introduction to the concept of parking and ridesharing trade-offs and the study issues, the study that developed a recommended ordinance is described; next, differences between the recommended and adopted ordinance are discussed; and, finally, the probable reasons for nonuse of the ordinance are presented. Lessons for other cities from Los Angeles' experience are outlined in the final section.

Parking and Ridesharing Trade-Offs

Minimum parking requirements for buildings are one way that cities control the traffic effects of new construction. The aim is generally to require enough parking so that building occupants or visitors do not need to park on city streets, especially in residential neighborhoods.

In general, the parking minimums range from 1 or 2 spaces per 1,000 gross square feet of office space in central business districts (CBDs) well served by transit, to 3 or 4 spaces per 1,000 gross square feet in suburban areas with poor transit service. Requirements for industrial and commercial property vary; the aim is to assure each commuter and visitor vehicle a parking space without imposing undue expense on an employer.

Office space usually averages about 250 ft^2 per employee, so 4 spaces per 1,000 ft^2 would permit every employee to drive alone. However, if employers are successful in encouraging commute alternatives to single-occupant vehicles or other traffic mitigation measures among their employees, they can reduce their parking needs far below the level of one space per employee. The principal commute alternatives are ridesharing (carpools, vanpools, and buspools); transit and paratransit modes; and bicycling or walking. Sometimes the term "ridesharing" is used loosely to refer to all of these modes, as will be done in the balance of this paper.

Figure 1 shows the wide variation of parking

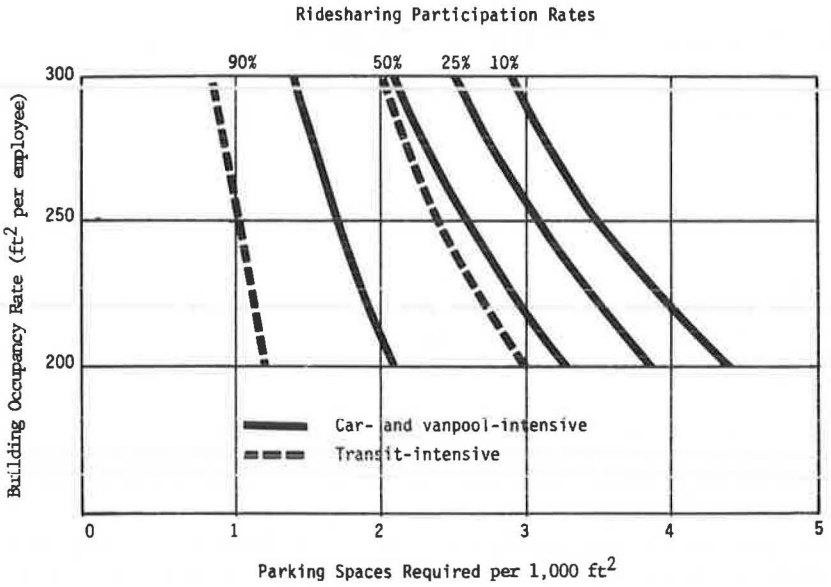

FIGURE 1 Parking spaces required at various ridesharing participation and building occupancy rates.

spaces required under different assumptions of building occupancy and employee participation in commute alternatives. A developer or an employer considering plant expansion could use Figure 1 to estimate the decrease of parking needs with higher commute alternative participation rates. For example, if the applicable city parking requirement is 3.5 spaces per 1,000 ft^2 and the anticipated building occupancy rate is 250 ft^2 per employee, a participation rate of about 27 percent will be needed to reduce the estimated parking requirements to 3 spaces per 1,000 ft^2. A 50 percent participation rate would reduce parking needs to about 2.5 spaces per 1,000 ft^2 depending somewhat on what fraction of ridesharers uses transit.

Table 1 gives the mode split assumptions underlying Figure 1, and Tables 2 and 3 give the derivation of the corresponding points plotted in the figure. Assumptions are as follows: Vanpools require one space per 12 vanpoolers, carpools require one space per 2.5 carpoolers. One HOV (high-occupancy vehicle) "floater" space is required per 10 ridesharers to accommodate their occasional need to bring their own car. SOV (single-occupant vehicle) users have a 10 percent absenteeism rate due to trips, sick leave, vacations, and so forth and thus require 9 spaces per 10 persons. Two visitor spaces are required per 100 employees.

Study Issues

A reduced parking requirement appears to be a logical trade-off for reducing parking demand through ridesharing promotion. If a bargain can be struck early and adhered to, the property owner can reduce building costs and the public can gain the benefits of less automotive traffic in the form of reduced congestion and better air quality. However, in the Los Angeles case and probably in all U.S. cities, there are three central issues or difficulties that must be resolved in adopting such an ordinance. These issues emerged early in the Los Angeles study and permeated the debate on the feasibility of implementing a parking management (PM) ordinance. The three issues are (a) leverage--can the city obtain PM agreements by offering reduced parking as an incentive? (b) legal assurances--how can the city be

TABLE 1 Illustrative Percentage of Employees Using Each Mode for Varying Ridesharing Programs and Participation Rates

	Transit Intensive [participation rate (%)]		Car-, Vanpool Intensive [participation rate (%)]			
Mode	90	50	90	50	25	10
Transit, bicycle, walk	70	25	20	10	8	2
Vanpool	10	7	20	12	3	0
Carpool	10	18	50	30	4	8
SOV	10	50	10	50	75	90
Total	100	100	100	100	100	100

TABLE 2 Parking Spaces Required for Varying Ridesharing Programs and Participation Rates (spaces per 100 employees)

	Transit Intensive [participation rate (%)]		Car-, Vanpool Intensive [participation rate (%)]			
Parking User Category	90	50	90	50	25	10
Transit and other users	0	0	0	0	0	0
Vanpool users	0.8	0.6	1.7	1.0	0.3	0
Carpool users	4.0	7.2	20.0	12.0	5.6	3.2
HOV floater spaces	9.0	5.0	9.0	5.0	2.5	1.0
SOV users	9.0	45.0	9.0	45.0	67.5	81.0
Visitors	2.0	2.0	2.0	2.0	2.0	2.0
Total spaces	24.8	59.8	41.7	65.0	77.9	87.2

TABLE 3 Corresponding Parking Spaces Required per 1,000 Ft^2

	Transit Intensive [participation rate (%)]		Car-, Vanpool Intensive [participation rate (%)]			
Square Feet per Employee	90	50	90	50	25	10
200	1.2	3.0	2.1	3.3	3.9	4.4
250	1.0	2.4	1.7	2.6	3.1	3.5
300	0.8	2.0	1.4	2.1	2.5	2.9

assured that the bargain will be kept? and (c) monitoring--what information can the city obtain to measure ongoing compliance? How the Los Angeles study addressed these issues is covered in the next section.

STUDY PHASE AND RECOMMENDED ORDINANCE

Objectives and Approach

The initial purpose of the parking management study was to determine the viability of "a parking substitution proposal." This proposal would have allowed a reduction of the number of parking spaces required on site or within 750 ft of the work site (1,500 ft of the site in the downtown parking district) in exchange for a space-for-space parking substitution at off-site, remote locations within the city. The initial proposal was considerably expanded and refined in the course of the study.

The major components of the study, their purpose, and the performing agencies may be summarized as follows:

Steering committee meetings were held to integrate views of relevant public and private sector interests. Meetings were conducted by the city's project manager.

A background study of the development of the city's parking requirements, procedures for administering those requirements, and the role of parking in the city's general plan was performed by the planning department. The purpose of the background study was to ensure that any new ordinance was developed in the context of existing parking regulatory procedures.

A survey of local parking requirements was conducted to evaluate actual parking demand at various types of office and industrial sites compared to city parking requirements. This determined the degree of leverage the city might have in offering to reduce requirements. The survey was performed by the planning department with much of the input data coming from site studies.

A survey of alternative ridesharing programs to evaluate the forms of employer-based ridesharing programs that are possible, the conditions under which they best operate, their costs and benefits, and their impacts on parking demand was performed by the city department of transportation (DOT).

A survey of PM programs in other cities, to profit from what has been learned in other applications, was performed by the planning department.

Detailed site studies were performed by the city DOT of specific office and industrial buildings to evaluate the various proposed PM measures in real-world settings and to develop some data on relevant functional relationships (e.g., the degree of ridesharing required to reduce parking demand below city-required levels).

Case studies--adjuncts to the site studies--were also performed on six additional sites with emphasis on exploring the feasibility of various methods of legal assurance and monitoring of compliance.

Alternative ordinance language, legal assurance, and monitoring procedures were developed for review by the steering committee. The evaluation and selection of the approach to be recommended to the planning commission was led by the project manager with most of the detailed preparation done by the planning department.

Selection of final ordinance language was led by the project manager and developed through consensus of the steering committee, the planning department, and the office of the city attorney, with lesser involvement of other city departments.

Preparation of guidelines for use by the zoning administrator in implementing the ordinance was done by the planning department with input from the city DOT.

Study Findings

The study began with the appointment of the steering committee in June 1980. The final task of the steering committee was to submit a draft parking management ordinance to the mayor and the city council. This task was completed in September 1981, at which time the review and modifications of the ordinance became the responsibility of the planning commission and the city council.

Although the end result of the staff study was a proposed parking management ordinance, several intermediate research findings were also significant. These were

- A compilation of ridesharing program components, including carpools and vanpools, fleetpools, subscription buses, transit passes, and shuttle buses;
- A summary of the uses of these ridesharing program components by employers in Los Angeles, together with measures of program effectiveness;
- A review of parking management programs in other cities; and
- A review of potential applications for the ordinance, through case studies of 10 exemplary development sites.

Key Issues and Their Resolution

Leverage

For an ordinance to be attractive to developers, the local parking minimums should be high enough that many or most developers will wish to seek reductions in the parking requirements. The Los Angeles city code, however, requires minimums of 1 space per 1,000 ft^2 of floor space within the CBD, 2 per 1,000 ft^2 outside the CBD, and usually from 3 to 3.3 per 1,000 ft^2 in cases in which discretionary review indicates the need for a higher parking minimum in order to prevent spillover parking on city streets. As is clear from Figure 1, only developments with relatively large floor areas per employee or relatively high ridesharing rates can manage even with 3 spaces per 1,000 ft^2, and the rates of 1 or 2 spaces per 1,000 ft^2 are inadequate for all buildings except those with exceptional ridesharing rates. In the vast majority of cases, building developers in Los Angeles are already installing more parking spaces than required by the city code, and few would want fewer than 3.3 per 1,000 ft^2 unless they had unusually good transit service or an effective employee ridesharing program, or both.

Only in two of the ten case study sites were there potential benefits from application of the proposed parking management ordinance. Warner Center, a large business park and cultural center in the San Fernando Valley section of Los Angeles, was one of these. However, Warner Center has since installed the full requirement of 3.3 spaces per 1,000 ft^2 instead of opting for a reduction in parking--even though Warner Center has an aggressive ridesharing program. Abbott Labs was the other case, but it has subsequently moved to another site to obtain increased parking space, instead of opting for less space plus an effective ridesharing program. Hence the results of the case studies at the time overwhelmingly confirmed the potential lack of leverage

by the city, and subsequent events have negated even the two examples that were considered favorable.

Legal Assurances

If an agreement is made between a building developer or user and a city (e.g., for building occupants to rideshare in return for some concession by the city), the agreement needs to contain some legal assurance that the bargain will be kept. The problem is complex in that a city will often be dealing with developers who somehow must bind future building owners and tenants to a ridesharing agreement. Should the agreed-to ridesharing program fail, the building owner might plead successfully that no remedy was possible (e.g., there was no space to build remedial parking spaces). The form of legal assurance could be so costly, as in a requirement to hold land vacant to house a future parking facility if needed, that the bargain might not be cost-effective for the developer.

The initial approach by city staff was to write a parking management ordinance requiring that legal assurance be established in a covenant whereby a developer would obtain or hold open an area for parking in the event that the ridesharing program proved unsuccessful. This was referred to within project discussions as the "nuclear deterrent" approach, giving the city immense power to enforce agreements.

Although this particular form of assurance would be highly acceptable from the perspective of the city, it was not acceptable to people in all of the situations the program was geared to address. In particular, when nearby parking areas could not be readily found, possibly unnecessary parking in structures would have had to be added at great expense. By permitting only one form of assurance, the applicability of the program would be limited. Thus it was decided that the range of assurances would be broadened to permit a selection based on an assessment of (a) the risk of noncompliance; (b) the objectives to be achieved; (c) the potential for adverse impact on the surrounding public; and (d) the unique circumstances of a particular application. In some cases, a covenant would be the preferred mechanism and should be required.

Monitoring of Compliance

A city should have some means for monitoring users of the parking management ordinance and detecting noncompliance. The fundamental choices are between self-reporting by users of the ordinance and active monitoring by a public agency that attempts direct observation of results--or some combination of the two extremes. However, in a successful large program, a city could have hundreds of agreements in existence. The cost of total active monitoring could be prohibitive, particularly the cost of obtaining sufficient data to provide a legal basis for claiming noncompliance. Probably the best compromise is self-reporting of an easily confirmed statistic, with some spot checks by the public agency.

The Los Angeles study determined that city monitoring of employers participating in a ridesharing arrangement would be too expensive. If the city's parking management efforts were successful, city staff would be needed to periodically measure employee participation rates in ridesharing. But adding to city staff for any reason was judged politically infeasible at the time of the study.

The plan proposed was to require the applicant, as a condition of the parking management arrangement, to annually survey the commute modes of its employees and determine, using city-provided formulas, actual reductions in parking requirements. This was to function as a self-certification process, minimizing continuing city staff involvement in inspection and enforcement. The applicant would file an annual report providing these data to show the degree of compliance. The zoning administrator was then to review the annual submittals for compliance.

RECOMMENDED AND ADOPTED ORDINANCES

Results and Recommendations of Staff Study

The culmination of the Los Angeles staff study was a four-volume report, submitted to UMTA in August 1981, summarizing all aspects of the study (1). In addition, the steering committee submitted a draft parking management ordinance, as well as guidelines for implementation of the ordinance, to the city planning commission.

The recommended form of legal assurance was a covenant or "alternative legal agreements as to assurances and remedies" found adequate to protect the city against failure to achieve the levels of compliance specified in the conditional use permit. The guidelines for implementing the ordinance suggested that the legal assurance (a) last the lifetime of the project, (b) provide for adjustments for failure to meet promised levels of parking demand, and (c) protect the city's interest in terms of default, bankruptcy, or sale of property.

The proposed monitoring system required that the applicant submit an annual statement with supporting data showing compliance with the agreement. This statement was to be the basis on which the zoning administrator recertified (or denied recertification to) the project. If recertification was denied, either parking would have to be expanded to the level from which it was reduced or the developer would have to gain the zoning administrator's approval of an alternative plan.

The steering committee also recommended that the parking management measures be implemented on a phased basis, applying them first only to applications for conditional use permits. If this proved to be successful, the measures were then to be applied to other applications to the city, such as for zoning changes, zoning variances, developments with a specific plan area, and environmental impact review (EIR) approval.

Modifications and Final Approval by the City

On receipt of the recommendations of the steering committee, the proposed parking management ordinance was reviewed by the planning commission and the city council for approximately 1 year. The only point of controversy was the form of legal assurance to be required in order to protect the city. The planning department supported the requirement of a covenant in all cases. Other city agencies wanted to keep the option for alternative legal assurances to be negotiated between the applicant and the zoning administrator before approval of the permit application would be granted. Because the steering committee and the project staff had by this time been disbanded, they were not consulted on resolution of this conflict.

The final ordinance was approved by the City Council of Los Angeles to become effective April 20, 1983. The views of the planning department had prevailed, and the option for equivalent forms of legal

assurance had been removed from the measure. Revisions to the wording of the code were also made in the interest of clarity.

Adopted Ordinance

The principal features of the adopted ordinance are summarized as follows:

- A conditional use permit must be obtained by the applicant, authorizing a variance from the city's minimum parking space requirement (e.g., 1 space per 1,000, 500, or 300 gross square feet for office space, depending on the density of development in the area).
- Reductions in parking requirements of up to 40 percent for on-site or 25 percent for remote parking are authorized if supported by a parking management plan submitted with the application for a conditional use permit.
- The land owner must either set aside enough open space to accommodate the full amount of parking required by the code or gain approval by the zoning administrator of an alternative plan if projected reductions in parking demand at the site are not achieved.
- Finally, the owner must record a covenant running with the land that if specified levels of compliance are not achieved the owner at that time will develop the additional parking spaces or other measures required on written request of the zoning administrator.

The zoning administrator is responsible for explaining and promoting the ordinance and for reviewing any resulting conditional use permit applications. City DOT staff review the adequacy of the transportation alternatives that are proposed in any applications. The planning commission must approve the parking variances requested under the ordinance.

REASONS FOR NONUSE OF THE ORDINANCE

Developer Experience and Comments

Only one serious inquiry about use of the ordinance has been received by Los Angeles from a developer since the effective date of the ordinance, and that inquiry was terminated before it resulted in an application. Discussions with the developer revealed that the reason for his inquiry was his interest in reducing his minimum requirement of 3 spaces per 1,000 ft^2 to 2.62 spaces, in view of a "solid" ridesharing program that had been prepared for him by a transportation consulting firm.

The Los Angeles DOT indicated in discussions that they would not agree to the indicated parking reduction until the developer's ridesharing measures were implemented and proven to be effective. In other words, parking had to be supplied at the rate of 3 spaces per 1,000 ft^2 until the need for less parking was demonstrated. [The Los Angeles DOT requires "solid historical evidence" of developers' ability and will follow through on promises to mitigate traffic by encouraging ridesharing at their projects. For example, another variation of this type of requirement that is used by the DOT is to approve only reduced parking for the first stage of construction in the conditions of use for a multistage project with relatively low parking levels. Approval of parking for the second or final stage is then made contingent on the developer meeting the parking demand targets for the first stage.] The developer believed that this was too severe a requirement and applied to the planning commission separately for a variance. In spite of the Los Angeles DOT's objections at the hearing, the planning commission approved a reduction of parking requirements to 2.5 spaces per 1,000 ft^2. Use of the parking management ordinance was therefore unnecessary in this case.

The foregoing case illustrates the strict evidence of rideshare program effectiveness that is required by the Los Angeles DOT for use of the parking management ordinance. It also shows the differing attitudes about granting parking reductions that exist within the city government.

Four other developers or developers' agents (engineering or legislative advocacy firms) were contacted for their views on the reasons for lack of use of the ordinance. Two of the firms interviewed had not heard of the ordinance. Staff of the other two firms were familiar with the ordinance but were not interested in using it. They believed that the reasons for its nonuse were as follows:

- Most developers do not know the ordinance exists.
- Those who do know it exists would often be unwilling to tolerate either (a) the delay of 3 to 9 months typically required in Los Angeles for approval of such variances (which could delay parking designs or completion dates for construction) or (b) the lack of clearly defined evaluation criteria for permit approval, particularly specified trade-offs between transportation alternatives and parking reductions.
- One developer believed that local lenders would sometimes oppose parking reductions out of a fear that inadequate parking would lessen the marketability of a property.
- Finally, one developer cited the diffusion of responsibility for the ordinance among the three city departments concerned with transportation, planning, and zoning, none of which agencies has a strong commitment to promoting and expediting applications for conditional use permits under the ordinance.

Although these "reasons" are only the opinions of developers, they appear plausible and were not contested by city of Los Angeles staff. The city zoning administrator and staff of the city DOT did attribute lack of use of the ordinance independently (without reference to the developers' opinions just cited) to the following three causes, which also seem quite plausible--especially the first one:

- The low level of minimum parking currently required by the city code.
- The restrictive provisions of the ordinance protecting the city, specifically the requirements for land set-asides and a covenant running with the land to bind future property owners.
- The lack of any city budget, staff, or materials for publicizing the ordinance.

Of all the reasons given by both developers and city staff for nonuse of the ordinance, three appear to be most significant: (a) the low present city minimum parking requirements, (b) the lack of specified evaluation criteria for permit approval, and (c) the fear of local lenders that overreducing parking will lessen marketability. None of the developers mentioned the restrictive nature of the ordinance's provision for legal assurance as a deterrent to use of the ordinance. The problems of lack of funds for promotion of the ordinance, diffusion of responsibility, delays in granting conditional use permits, and lack of developer awareness do not need to be addressed unless changes are made to increase the usefulness and use of the ordinance.

The problem of low minimum parking requirements was foreseen in the results of the case studies but was never reconciled or fully addressed during passage of the ordinance. The low minimum parking requirements are also related to the alleged fear of local lenders that overreducing parking will lessen marketability. Higher parking minimums would certainly reduce these fears.

The lack of specified evaluation criteria for permit approvals, including advance agreement on the range of parking reduction effectiveness that will be attributed to specific transportation alternatives, has probably contributed to the lack of use of the ordinance. The absence of such criteria places both the burden of proof and the risk of not achieving predicted parking reduction levels entirely on the developer or his consultant.

There are other ways to reduce the actual or apparent developer risk under the Los Angeles ordinance, as evidenced by the approach in a transportation system management (TSM) ordinance that was recently adopted by the city of Pleasanton, east of San Francisco Bay (see paper by Curry and Fraser-Middleton in this Record). The Pleasanton ordinance specifies review of an employer's TSM program effectiveness by the city after 2 years. If ridesharing results are below agreed targets, remedial measures to increase the effectiveness of the employer's program can be prescribed by the city's TSM task force (an advisory committee of employer and business park representatives). In effect, this introduces both a peer review process and the opportunity for remedial steps short of providing more parking, which is the single threat posed by the Los Angeles ordinance.

Plans for Modifications to the Parking Management Strategy

Los Angeles is currently considering raising its basic parking requirement to a more realistic level of 3 spaces per 1,000 gross ft^2. This would also provide more incentive for use of the ordinance to reduce parking requirements. However, a change in the minimum parking requirement will not be made until funding is found for a proposed study of the city's parking requirements.

There are no plans to rectify the other possible causes for lack of use of the ordinance in the near future. There is no available funding for promotion of the ordinance. Action to quantify the effectiveness of specific transportation alternatives in reducing parking demand will probably not be taken until the specified trade-offs in parking management tactics being tested in other jurisdictions are proven valid. No changes in the institutional setting of parking management in Los Angeles are foreseen. Probably this matter is not considered to be particularly urgent by the city, because there are other means for encouraging developers to include traffic mitigation measures in their plans. The three principal ones are as follows:

- Review of applications for variances and environmental impact reports for most large developments by the city DOT, which usually results in detailed specifications for traffic mitigation measures by the city if they are not already part of the plans.
- Consulting services that are now offered to developers by Commuter Computer, the local ridesharing agency, to assist them in preparing the transportation or TSM element of their plans (other consulting firms are in the same business).
- Moratoriums on building permits in the Westwood Community Plan Area and the Westchester-Los Angeles International Airport-Venice-Palms transportation corridor. The moratoriums require developers in those areas to submit an initial traffic assessment or study and a transportation plan that reduces traffic impacts to an insignificant level before a building permit will be issued, due to exceptionally severe traffic congestion in the two areas.

In addition, the Los Angeles DOT is considering an ordinance that would require developers in traffic-impacted areas to pay a one-time fee for each commute vehicle trip generated by their project. The fees could be used to improve the regional traffic circulation system (which is affected even by local developments) as well as for local traffic improvements. No definite fee level has been arrived at, though a fee of $800 per vehicle trip was incorporated in a similar ordinance considered for the Westwood Community Plan Area. Such fees could provide some added incentive for developers to provide for ridesharing programs that would reduce the vehicle trips to their projects. Los Angeles DOT expects this ordinance to be in place, if it is accepted by the city council, by mid-1985.

CONCLUSIONS

The reasons given by developers and city staff for nonuse of the Los Angeles parking management ordinance should serve as reminders of pitfalls to other cities devising such ordinances. However, few cities are comparable to Los Angeles in size and complexity, and it is possible to separate the reasons given into those of more general applicability and those that would be peculiar to large cities. Those reasons of general applicability are

- The low level of minimum parking already required;
- Fear by lenders that overreducing parking would lessen marketability of a property;
- Lack of familiarity with the ordinance by developers (due in part to lack of city resources for publicizing the ordinance); and
- Restrictive provisions of the ordinance protecting the city, especially land set-asides and covenants.

The last of these reasons may be unavoidable. Some enforcement provisions are needed, and, given the adequacy of an ordinance on other counts, they should not be critical disadvantages of an ordinance.

The two other reasons mentioned for nonuse of the ordinance are probably relevant only to large cities:

- Delays of 3 to 9 months in obtaining conditional use permits under the ordinance and
- Diffusion of responsibility for the ordinance among different city departments.

Cities would also do well to check the model parking code (2) and Traffic Mitigation Reference Guide (3) along with progress of the new TSM ordinance of the city of Pleasanton, California, when devising their own ordinances for encouraging traffic mitigation.

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