

Evaluation of a Downtown ADA Parking Pilot Proposal

February 18, 2022

In January 2021, representatives from the Northern California Spinal Cord Injury Foundation approached Town staff about their interest in a pilot program for Americans with Disabilities Act (ADA) mandated parking spaces. The purpose of the pilot would be to increase the availability of wheelchair accessible parking spaces under the assumption that “95% of occupants of Wheelchair Accessible Parking Spaces do not require additional space to access their vehicle”.

Background on ADA Parking Spaces

The ADA identifies two categories of accessible parking spaces: accessible and van accessible. A van accessible space has increased aisle space adjacent to the space to allow for vehicles with ramps or other devices to facilitate vehicle entry and exit. The ADA has specific requirements for the quantities and sizes of each category of accessible parking spaces in proportion to the overall number of parking spaces in a parking lot. The ADA is very prescriptive in its requirements and those requirements are minimum standards.

The Proposed Pilot

Although not fully developed, the concept as presented to Town staff would involve the following:

- Identification of non-ADA parking spaces (those that are not painted blue) near to or adjacent to van accessible spaces.
- Addition of signage requesting individuals with ADA placards to utilize the non-ADA spaces if they do not require the extra space.
- Addition of signage identifying the adjacent non-ADA spaces as preferential (but not legal) spaces for those with ADA placards.
- Implementation of an “intensive media campaign” for education of the public.

Evaluation of the Proposal

The Complete Streets and Transportation Commission (CSTC) heard the proposal in early 2021 and adopted the evaluation as a Commission priority for the year. The Commission’s work in evaluating the proposal would be a quantitative data collection and analysis effort, which combined with a staff evaluation of ADA compliance, would inform future direction.

The CSTC reviewed a data collection model and approved representative sampling for data collection. The data collection included a review of all downtown public parking lots, identifying the number of spaces, occupancy counts, vans present, and vehicles without placards (illegally parked). Evaluation periods included morning, afternoon, and evening timeframes on weekdays and weekends.

The data collected from the site surveys by CSTC members identified broad availability of van accessible parking. The highest level of occupancy was noted as Tuesdays (42% occupancy) and afternoons (43% occupancy). Follow up data collection to add additional evening data collection presented similar results.

Staff also evaluated the technical elements of the proposal. Staff noted the following concerns:

- An “Intensive Media Campaign” would likely not be sufficient to educate potential users due to the localized nature of the implementation and the ever-changing clientele in the downtown. The outreach and education would need to be ongoing and consistent. Staff resources do not exist to meet this need in the short or long-term.
- Non-standard signage stands a high chance of causing confusion for users. As noted above, the ADA is absolute in its requirements. Non-standard implementations face the potential for being deemed non-compliant with the ADA.
- Many who have an ADA placard and do not use the space for wheelchair access still require the facilities that an ADA compliant space provides. This can include the level surface for standing and walking, the ramp that facilitates mounting the sidewalk, tactile elements that help the visually impaired, etc. It may be presumptuous to provide a system that brings focus to those with disabilities that do not require a wheelchair.
- Signage on additional spaces would discourage non-ADA users from utilizing those spaces. These could be critical spaces for the overall parking program as significant adjustments in the parking program are imminent.
- The pilot was evaluated in comparison with opportunity costs for other ADA efforts. Town staff have been developing an ADA Transition Plan, a portion of which addresses deficiencies in Downtown parking spaces. Currently identified ADA related parking compliance needs exceed \$375,000.

Costs and Conclusions

The CSTC reviewed and discussed the proposed pilot based on the utilization data collected and determined that no pilot project was warranted given the availability of ADA parking.

The cost to implement a pilot project as conceived here would largely involve time commitments from staff. Oversight and management would require an estimated 60 hours at startup and an ongoing 3-5 hours per week. Staffing to conduct the actual pilot, especially given the “intense media campaign” would require a minimum of 80 hours to startup the pilot and an ongoing 8-10 hours per week. Costs for signage, campaign information, and other hard costs are estimated at \$15,000. Given the current workload, there is no existing capacity to take on such a work effort.

Given the additional technical evaluation and anticipated workload, Town staff concurs with the recommendation of the CSTC not to proceed with the pilot. If Council wishes to add the pilot, other capital projects would need to be removed/delayed.