

November 16, 2020

Members of the Development Review Board,

As a proud partner of CATMA, UVM and Champlain, and a committed sustainable transportation provider, CarShare Vermont respectfully offers the following comments on the proposed Joint Institutional Parking Management Plan:

- **It should be recognized that the intent of the JIPMP is to encourage the institutions to better manage parking demand, not simply build more parking supply.** Increasing parking supply has serious environmental consequences--from increased stormwater runoff to higher emissions from induced vehicle ownership and VMT--as well as financial and opportunity costs for the institutions, surrounding neighborhoods and the city. In fact, changes to our comprehensive development ordinance were passed this fall in recognition of the high costs of parking. Yet the JIPMP states on page 20 that “wherever possible UVM will attempt to reallocate space to create more parking.” The plan further affirms this approach by relying heavily on remote parking and shuttle systems to address projected parking gaps. This is not a long-term solution, and should not rightly be considered a “TDM measure,” as it simply moves the problem somewhere else. This is in direct conflict with city goals articulated in other various plans, including the most recent Net Zero Energy roadmap.
- **The JIPMP should emphasize the “joint” aspect of the parking management plan.** Trends for vehicle ownership and drive-alone rates are very different for each institution, with Champlain demonstrating the most success, and UVM experiencing lost gains in student vehicle ownership on campus and drive alone rates for staff and students living more than a ½ mile away. While transportation patterns for UVM Medical will naturally differ from UVM or Champlain, this may also reflect different policies and (lesser) TDM options available to affiliates of each institution. Regardless of the availability of parking, it should be concerning that drive-alone trends for two of three institutions are headed in the wrong direction, and the city ought to be able to see a joint plan for how the institutions will address that issue.
- **The city could require that UVM and Champlain include second-year students in its parking prohibition.** It is likely not enough for the Planning Commission to keep recommending something that could be required as a matter of policy. Approval of this plan gives the institutions a 5-year timeframe to follow a recommendation or not, and a significant development benefit without a guarantee that some of these trends will change. Disallowing permits for sophomores/second-year students, as is currently done for first-year students (and done elsewhere in the country), can provide a tangible change in return for approval. Indeed, one of the UVM plans referenced is the Nelson\Nygaard Parking & Transportation Plan. Among the many recommendations by its own consultant: “Undergraduate Parking Restrictions: This is a common practice among universities actively engaged in TDM. Among these schools, there are several precedents for extending parking restrictions to 2nd Year students, and even all undergraduate students.”



- **The current plan could be updated.** On page 11, the JIPMP references an earlier plan with the company formerly known as Gotcha to bring 200 e-bikes to Burlington, with projected reductions in drive-alone rates. That company has been bought out by Last Mile Holdings and the plan to bring e-bikes, as we understand it, is now defunct. On page 15, the JIPMP references the subsidy level of Champlain College for its carsharing program as \$7,500-\$10,000. The level has been \$7,500 annually starting July 1, 2019 through our current agreement which expires July 1, 2021. We would expect some preliminary data on impacts of the pandemic, but understand some of the difficulties in obtaining it. While teleworking ought to become more institutionalized in the aftermath of COVID-19, we are not sure what the long-term effects will really be. The institutions should be able to present longer-term shifts in policy so that their impacts might be projected and then measured over the next five years. Concern over virus transmission on public transit may have long-term implications in the opposite direction. There should be a plan for tracking all of these impacts that does not rest on the easy assumption that things will just get better. Perhaps a shorter approval period (1 to 2 years) is in order so that there is time to better understand various trends, and more accountability for how this plan will address them.
- **Price parking appropriately.** The Nelson\Nygaard plan also notes “below-market parking rates” as a “key issue.” Parking prices impact the effectiveness of existing TDM programs and can be an effective TDM measure if set high enough. Likewise, the city, through the Public Works Commission, ought to look at a more effective residential parking permit plan to discourage spillover demand into on-street parking spaces in the adjacent neighborhoods. The JIPMP gives some indication that rather than using remote lots and shuttling in, some staff and students find on-street spaces in nearby neighborhoods. There was also the suggestion that parking counts for those areas is difficult because of the inability to discern whether a vehicle is campus-affiliated or not. A residential parking permit plan could better account for these parking impacts.

Many thanks for your consideration of our thoughts. Please feel free to reach out with any questions.

All the best,



Patrick Murphy

Director of Planning & Operations

