

To: DRB
From: B. Headrick
Date: 11/16/2020
Re: UVM's JIPMP for 2020-2025

Since 2012, I've closely studied UVM's annual parking reports and followed UVM projects that affect its on-campus parking supply and demand. The reason I am interested is to protect residential neighborhoods adjacent to campus from UVM's parking demand and traffic impacts. This goal is relevant to the JIPMP review because my analysis of UVM's data indicates parking space deficits. My findings indicate that:

- UVM currently has a parking deficit of -556 spaces (Exhibit 1)
- UVM'S data indicates a -494 parking space deficit in Year 2025 (Exhibit 2)
- UVM already has an evening parking deficit of -256 spaces when it hosts sold out men's basketball games with 3,000 spectators and a -536 parking space deficit when it hosts sold out hockey games with 4,000 spectators. (Exhibit 3)
- UVM's evening parking deficits will increase when UVM starts using the renovated and expanded PFG Complex to host larger events, including:
 1. 5,000 person events by using Gutterson and the Tarrant Multipurpose Event Center concurrently to host singular events (1 event in two venues):
 - Reference 2/7/2019 memo from UVM to Act 250 Commission. Exhibit 4 UVM says it will host 5,000 person events in Gutterson/Tarrant space -- using both venues at the same time for 1 event. (On multiple occasions.) In this memo, UVM also mentions that it will host rare and unusually large events with more than 5,000 event attendees. This tells us that 5,000 person events will be the **new normal** for the expanded / renovated PFG Complex because events with more than 5,000 attendees are characterized as "rare and unusually large". The UVM wording regarding events with more than 5,000 attendees is tricky. Is UVM saying that some events with more than 5,000 attendees will be rare and other events with more than 5,000 persons will be unusually large but not necessarily rare? Or will all events with more than 5,000 persons be rare? A strict reading indicates the former.
 - During the October 2018 Act 250 review of UVM's PFG permit application, UVM told the Act 250 Commission that it has 850 to 1,100 parking spaces available in the evening when there are no PFG events. The Act 250 Commission calculated that UVM will have parking deficits of -150 to -400 parking spaces when it begins hosting 5,000 person events. (Exhibit 5)

- I believe that UVM’s evening event-caused parking space deficits will exceed (-400) spaces because my Fall 2018 parking lot space counts showed only 551 spaces available when no evening events are being hosted at the PFG Complex. Based on UVM already having a (-256) parking space deficit for 3,000 person events, and a (-536) parking space deficit for 4,000 person events (sold out hockey games), UVM will have a (-699) parking space deficit when it hosts 5,000 person events. (Exhibit 6)
2. 6,300 person events in Gutterson. These 6,300 person events will use the 2,000 seat increase in seating capacity that the Gutterson venue is gaining via the PFG project. Exhibit 7 provides evidence of Gutterson’s increased seating capacity. 6,300 person events will cause a -1,024 parking space deficit (Exhibit 6)
 3. “7,300 spectators at one time” on the Athletic Campus (Exhibit 7). This is in the Project Description that UVM provided to the DRB when requesting a permit for the PFG project in 2018.) When UVM hosts 7,300 spectators at one time on the Athletic Campus, UVM’s parking deficit will be(-1,274) parking spaces. (Exhibit 6)
 4. **Size of events will be larger than before:**
In addition to UVM’s regular season athletic events, UVM’s forecast includes other kinds of events for the renovated / expanded PFG Complex, including:
 - **6 large concerts with 5,000 attendees/event**
 - 6 more concerts with 2,500 attendees/event
 - **4 Regional tournaments with 5,000 visitors per event**
 - 5 high school graduations with 3,000 visitors per event
 - 4 conventions/tradeshows with 3,250 visitors/event
 - 4 consumer shows with 2,800 visitors/event
 - 8 banquets with 1,500 visitors/event
 - 8 “other” events with average attendance of 3,000 persons

The UVM consultant for the PFG project forecast **248,000 event attendees per year**. (Exhibit 8)

5. **Events will occur frequently. Averaging 4 per week year-round.**
We can expect 210 days of event traffic /year. (Exhibit 9)

Question 1: If the DRB comes to the conclusion that it is not certain of UVM having a current and future parking surplus, especially given the Act 250 Commission’s March 2019 Finding that UVM will have parking deficits stemming from large PFG events, and UVM’s Jon Dowds email (Exhibit 10) referring to **whether on-street parking will become available** when he was asked if UVM has a parking deficit, will the DRB apply CDO Article 8 (Section 8.3.5) to deny UVM a parking waiver at this time?

Question 2: Would the DRB be willing to grant UVM a 5-year parking waiver if UVM agrees to shift at least 50% of its Fall 2018 parking demand (5,004 parking spaces x 50% = 2500 cars) to remote (outside of Burlington) park and ride lots by Fall 2024? This would advance our city's progress in achieving goals listed in CDO Article 8 and planBTV.

DAYTIME PEAK DEMAND FOR PARKING SPACES

The purpose of the information below is to show that there are good reasons for the DRB to not have high confidence in UVM's presentation of having parking surpluses today and 5 years out. Please consider this information when deciding whether to grant no parking waiver or a one- or five-year parking waiver, and with or without conditions.

1. In the 2020-2025 JIPMP, UVM's current net parking supply is a range estimate of 185 parking spaces +/- 210 parking spaces. UVM is using a range because UVM is not certain of its net number of available parking spaces. UVM thinks that it might have a parking deficit ($185 - 210 = -25$) or it might have a parking surplus of ($185+210 = 395$), or some number in-between negative 25 and a surplus of 395. Per UVM, the uncertainty that is implicit with their survey results is captured by using an estimated range for UVM's net parking situation. (Exhibit 11)
2. In an email that I received from UVM (Jon Dowds, UVM Transportation Research, worked on the JIPMP), I have the impression that he thinks the degree to which UVM already uses and will use on-street parking in the future will impact whether UVM has an on-campus parking deficit. (Exhibit 10). Just based on this UVM comment, I believe the DRB would have good reason to not offer UVM a 5-year parking waiver.
3. UVM's parking situation is worse than UVM presents in the JIPMP because unmet (unsatisfied) demand is not included in UVM's parking demand estimates. (Exhibit 11) UVM's unmet (unsatisfied) parking demand exceeds the 25 drivers ($185-210 = -25$). Unmet demand includes drivers who cannot find a convenient parking space on campus. For example, someone who is going to the Athletic Center won't want to park on the Trinity campus. When the UVM lots are more than 85% full, finding an empty parking space becomes too difficult. Searching for one empty parking space among many full and scattered parking lots can be like searching for a needle in a haystack. According to UVM, there is unmet (latent/hidden) parking demand when UVM's parking lot utilization rate exceeds 85%. (Reference Appendix B of the JIPMP supplemental report, page 42, 2nd paragraph).
4. Based on data in the 2020-2025 JIPMP, UVM's daytime peak utilization rate ranges from 91% to 100% full. *Therefore, even in the best-case scenario (with UVM's margin of error added to the mid-point number), UVM's parking demand exceeds UVM's effective parking capacity.* Per my calculations, UVM needs 756 off-site parking spaces in Fall 2021 and 894 off-site parking spaces in Year 2025 to bring its daytime peak utilization rate down to 85% , at which point UVM has which is hit its effective parking capacity. (Exhibits 1 and 2)

5. In Fall 2019, UVM people were advertising on FPF looking for off-street parking spaces near the UVM campus. Some were also knocking on my front door and asking if they could rent a parking space in my driveway. This is very strong evidence that UVM had a parking deficit in Fall 2019. (Exhibit 12) UVM's 2020 net supply is based on Fall 2019 – which is a deficit situation.

6. In February 2018, UVM's Board of Trustees discussed the need for UVM Parking administrators to communicate programs that will spread out peak parking demand over more hours (to reduce shortage of on-campus spaces) and for TDM programs to better serve commuter needs. (Exhibit 13). Again, this is strong evidence that UVM had a parking shortage in Fall 2019.

7. An analysis of trends and changes in UVM's parking supply and demand over time finds that UVM's on-campus parking demand has increased by more than the increase in its on-campus parking supply. (Exhibit 14)

8. In addition, UVM has significantly increased the number of on-campus parking permits it issues each year. In Fall 2019, UVM issued 19% more permits than it did in Fall 2018. In Fall 2018, UVM issued 9% more permits than it did in Fall 2017. This equated to a 1,615 more parking permits being issued in Fall 2019 than had been issued in Fall 2017. In comparison, UVM's on-campus parking supply only increased by 432 spaces. This eroded UVM on-campus parking surplus between 2017 and 2019. (Exhibit 15).

9. UVM enrolled 1,505 more students in Fall 2019 than it had forecasted in its 2014-2019 JIPMP. This caused more on-campus parking demand than what UVM forecasted for Fall 2019. Based on UVM's formula, this translates in UVM needing 398 more parking spaces than it anticipated for Fall 2019. (Exhibit 16).

UVM FORECAST FOR 2025

10. UVM's 2014-2019 JIPMP forecast for 2019's peak daytime parking was a 748 parking space surplus. But UVM's new estimate (based on Fall 2019 data) is that UVM has a 185 +/- 210 spaces available. This forecasting error is between -300 and -750 parking spaces. Therefore, there is reason to have low confidence in UVM's forecast of having 255 +/- 204 parking spaces in Year 2025.

11. The UVM JIPMP for 2019-2024 that was published in March 2019 reported a parking deficit of -533 spaces for Fall 2019 and a forecasted parking deficit of -700 spaces for Year 2024. The report was revised and published again in May 2019, and at that time UVM reported a parking deficit of -414 spaces for Fall 2019 and a parking deficit forecast of -469 parking spaces for Year 2024. (Exhibits 17 and 18)

12. In reporting parking deficits for 2019-2024, UVM did not qualify under CDO Section 8 for parking waivers. This explains why UVM withdrew those reports and re-submitted new numbers to show that it might have a parking surplus depending on what end of the estimate

range one considers and depending on UVM actually using the off-site parking spaces. After considering the information provided in points listed above (1 to 10), there is good reason to doubt UVM's 2020-2025 JIPMP.

13. Evidence of parking deficits (Board of Trustee minutes, PPF ads for parking, UVM email about interest in on-street parking to solve a parking deficit, large forecasting errors in the 2014-2019 JIPMP, and multiple revisions of the 2019-2024 JIPMP), all indicate that UVM's 2020-2025 JIPMP may have been tailored for the purpose of showing that UVM might have a surplus (even though evidence indicates that a parking deficit exists) in order to obtain a 5-year parking waiver from the DRB.

14. UVM's forecast of its parking demand vs supply for Year 2025 indicates a 91% utilization rate in the best case scenario. Best case scenario is when adding (and not subtracting) the margin of error to the midpoint of the estimated net parking space range. This means that UVM's forecasted parking demand will exceed its effective capacity in 2025. UVM needs 894 off-site parking spaces in Year 2025 to reduce its campus-wide parking lot utilization rate from 91% to 85%. (When lots are 85% full, UVM has reached its effective capacity). (Exhibit 19)

EVENING PARKING DEMAND WHEN THERE ARE PFG EVENTS

15. In 2018, UVM told the Act 250 Commission that in the evening, without any PFG events, UVM currently has between 850-1,100 parking spaces available at the PFG parking area and the Jeffords Parking Lot. The Act 250 Commission determined that there would be a -400 to -150 parking space deficit in the evening for 5,000 person events at the PFG Complex. (Exhibit 5)

16. Based on UVM's Fall 2019 data, UVM data for ticket sales, and information obtained from UVM during the October 2018 Act 250 Commission review of UVM's PFG permit application, and my parking counts in 2018, my analysis indicates that (before co-vid) UVM had a -256 parking space deficit in the evenings when it hosted sold-out basketball games and a -536 parking space deficit when it hosted sold out men's hockey games. (Exhibit 3)

17. Largest event to date was in 2012 when Obama spoke at PFG. (4,500 persons) (Exhibit 20)

18. UVM intends to host larger events on the Athletic Campus with 5,000 persons, 6,300 persons, and 7,300 persons. I know this from UVM memos, UVM Trustee meeting minutes, and by participating in the Act 250 Commission hearing for the PFG's permit. (Exhibit 4)

Exhibit 21: Board of Trustee minutes and VT Business press release indicate that as a result of the PFG renovation and expansion, Gutterson's seating capacity will increase by 2,000 seats. New seating capacity including floor space will be 6,300 persons. This was confirmed the Director of UVM Athletics during the Act 250 Commission hearing.

Exhibit 4: UVM memo to Act 250 Commission regarding UVM plans to use 2 indoor PFG venues (Gutterson and Tarrant Multipurpose Event Center) concurrently for singular events (1 event in both venues) and hosting up to 5,000 visitors at one time on the Athletic Campus as a normal course of business, but even larger events would be hosted but these would be rare and unusually large.

Exhibit 8: UVM forecast of other kinds of events it would like to host in the PFG Complex

Exhibit 9: Forecast for how frequent PFG events will occur. (210 event traffic days a year)

Exhibit 7: PFG Project Description says up to 7,300 visitors on Athletic Campus at one time.

19. When the PFG renovation and expansion is completed, and UVM hosts 5,000 person, 6,300 person, and 7,300 person events on the Athletic Campus, UVM will have respective parking space deficits of (699), (1,024), and (1,274). (Exhibits 6 and 7)

20. Even in the best case and unrealistic scenario of filling seats with on-campus students to the greatest extent possible, in order to have as few as possible event attendees arriving by car, UVM's parking demand will exceed its effective capacity. Lot utilization rates will range from 87% to 97%, and the spots that are available will be far from the Athletic Campus. (Exhibit 22)

21. Given the volume of parking needed in the evening for large PFG events, and the high frequency of the PFG events (210 days a year), and the Act 250 Commission's finding that there will be parking deficits in the evening due to PFG events, UVM should start providing in its annual JIPMP updates and the 5-year JIPMP reports a campus wide parking demand and supply analysis for different size events. (3,000 persons or more; or when there are for example multiple 1500 person events on-campus)

22. Even though evening event parking demand has not been addressed in the JIPMP in the past, UVM's goal of increasing rental use of the venue and hosting larger events means that the event parking demand (when 3,000 person and larger events are hosted, or multiple events are hosted on campus that add to this number) should not be ignored or dismissed when UVM prepares the JIPMP. Providing both daytime and evening parking supply and demand analysis would be consistent with CDO. CDO Article 8.3.3 states: "... an Institutional Parking Management Plan shall include... an analysis of the anticipated parking demand by user group, **time of day** and/or **demand by use**;"

This rest of this document is organized as follows:

- Goals of CDO Article 8 and planBTV (page 7)
- Is the city about to increase public access to parking on streets near UVM?
- UVM use of on-street parking would be counterproductive to CDO and plan BTV goals
- Use of on-street parking would shift some of UVM costs and burdens for parking to people who live near campus and the broader community

- Will UVM's excess parking land in new garages on the periphery of campus? Along residential streets?
- Why is UVM waiting until 2025 to start a remote (outside of Burlington) park and ride?
- Strategic policies can encourage UVM to use remote park and ride lots instead of on-street parking and instead of new garages
- Disadvantages of 5-year parking waivers
- Do we need to revise the criteria for earning a parking waiver? Is there too much focus on building more parking spaces if the DRB deems that the supply is inadequate? How about requiring remote (outside of Burlington) park and ride program if supply is deemed inadequate?

Exhibits with supporting evidence are in a separately attached document.

Goals of CDO Article 8 and planBTV

The intent of CDO Article 8 is to ensure that:

- The university's parking doesn't overflow onto adjacent streets because doing so would cause an unfair burden on those adjacent residential neighborhoods; and that
- The university parking management plan advances the goals of the municipal development plan (planBTV) to reduce dependence on single-passenger vehicles. (CDO Article 8, sections 8.1.1, 8.1.15, 8.3.1)

The Municipal Development Plan (planBTV) and CDO Article 8's goals (Sections 8.1.15 and 8.3.1) include:

- Reducing the number of SOV vehicles on our city streets
- Reducing congestion on streets and contributing to traffic safety
- Increasing safety for pedestrians and bicyclists
- Encouraging carbon-free modes of transportation
- Implementing remote (outside of Burlington) park & ride programs (Exhibit 23)
- Reducing pollution
- Protecting quality of life in residential neighborhoods

The city's 2015 Residential Parking Strategy, which has since been adopted into planBTV, has as one of its top recommendations that UVM start a remote (outside of Burlington) park and ride program. (Exhibit 23)

Because UVM has a parking deficit, we have to ask: Where will UVM's excess parking land? In a new garage? Or in remote (outside of Burlington) park and ride lots? Or on-street in residential neighborhoods that border campus? Which of these best advances the objectives of planBTV, the intent of CDO Article 8, and is

best for our environment and entire community? Answer: Remote (outside of Burlington) park and ride lots.

Is UVM going to gain access to on-street parking via a city policy or regulation change?

Currently, public access to parking on residential streets adjacent to and near UVM is limited by city regulations. Prior to the city tweaking the Resident Permit Parking program in 2015, the city earned \$200,000 profit/year (\$300,000 in revenues - \$100,000 in expenses) on the sale of Resident Parking Permits.

During the Planning Commission meeting on 11/10/2020, the city planner mentioned that the DPW had recently requested information from the Planning Department regarding the on-street parking regulations for streets near UVM's campus. The DPW is currently reviewing on-street parking regulations for streets near UVM to decide if changes should be made to increase public access to on-street parking near UVM. This is a resurrection of some ideas that were vetted and tabled (for a pre-determined 5-year period) after significant public protest by UVM's neighborhoods in 2015.

The influence behind this might be the fact that on-street parking is cheaper for UVM than running park and ride programs and building garages. Also, some city administrators and leaders are morally conflicted about our need to achieve environmental goals by reducing the number of SOV versus the opportunity to collect more revenues by monetizing curbside parking spaces. Clearly, the environment and reducing the number of SOV drivers should be our shared priority and, in my opinion, curbside space should be left open for bicycle transportation. That space is needed to encourage more people to bike instead of drive.

The Public Works Commission (and not City Council) will vote on any changes to on-street parking regulations and the Residential Permit Parking program. One of Burlington's Public Works Commissioners is UVM's Director of Transportation, and he is responsible for managing UVM's parking supply and demand. Another PW Commissioner also works for UVM in a Transportation function and has a close working relationship with UVM Director of Transportation (fellow Commissioner) as he is one of her internal UVM customers.

Thus, in the near future, people who live near UVM may need to get very involved in city meetings to keep UVM from gaining access to on-street parking. There is significant risk that UVM may gain access to on-street parking if current city regulations and Residential Permit Parking program are modified.

If UVM begins to use on-street parking, some of UVM's costs and parking burdens will shift to Burlington residents

If the city changes its on-street parking program policies or parking regulations in a way to increase public access to parking on streets near UVM, those parking spaces will be

immediately filled by UVM students, employees, and visitors – even if the city charges a premium for parking on streets near campus.

Therefore, if the city modifies the Residential Permit Parking Program or on-street parking regulations, and UVM gains access to on-street parking to supplement its on-campus parking supply, that city policy change would save UVM money but increase financial and health costs borne by the general public and especially those who live close to campus. The cost and burden shift would cause residential neighborhoods and the environment permanent harm. The cost impact on people who live in neighborhoods near UVM would include:

- Costs of health care related to more pollution and reduced safety
- Lower property values if neighborhood streets become UVM’s parking lots
- Damage to cars caused by others who are parking on the street as commuters
- Increased car insurance rates
- Litter left behind by UVM drivers who park on-street
- Increased road maintenance expense as a result of more use
- Negative environmental effects
- Less space for bicycling in the street, causing people to drive rather than bike

If UVM gains access to on-street parking, that would be counterproductive to the objectives of planBTV and the intent of Article 8.

Question 3: If UVM is granted a parking waiver, is UVM still responsible for providing adequate off-street parking to satisfy its demand? Is UVM thinking that it might be able to use on-street parking for its excess parking demand? If the city changes policies/regulations to increase public access to on-street parking, will UVM be prevented by the intent of Article 8 to not use on-street parking to satisfy its excess parking demand?

Question 4: Is it possible for the DRB to add conditions to the DRB Findings and the parking waiver or zoning/building permits to expressly prohibit UVM from using on-street parking?

Will UVM’s excess parking demand land in new garages?

Per UVM’s Master Plan and 2019 Board of Trustee minutes, UVM wants to shift traffic from on-campus to off-campus by relocating campus parking to the periphery of campus. To achieve this, UVM’s strategy is to build garages and expand parking lots along streets adjacent to campus. (Exhibit 24)

The effect will be to transfer UVM’s on-campus traffic into the adjacent neighborhoods.

Garages and parking lots on residential streets that border campus will lead to more traffic and reduced safety on these residential streets. Building more parking facilities or increasing the number of parking spaces by enlarging lots or using on-street parking, will increase SOV driving.

Badly located parking facilities (it's bad if it's located along a residential street) harm neighborhoods and the environment and are contradictory to the goals of CDO Article 8 and planBTV.

Doesn't the JIPMP 2020-2025 already include a remote (outside of Burlington) park & ride program? The Colchester program is only on-paper. Not active. Why is UVM waiting till 2025? (In case on-street parking becomes available before 2025?)

Is the Pine Street lot a park and ride? Answer: No. Because of limited access it is more like warehousing

UVM leased 200 parking spaces on Pine Street from VT Railroad on 10/11/2019 and then sub-leased the 200 spaces to an auto-dealer until August 2021. UVM used these 200 spaces to satisfy a condition of the Beaumont permit it received from the DRB in 2019. These spaces are not an equitable replacement of the spaces lost on campus as a result of the Beaumont project. Nor are they a serious park and ride effort because drivers have limited access to their cars (Monday – Friday 7am to 5pm access unless a rare exception is granted); and UVM did not provide daily shuttles to/from Pine Street. The Pine Street lot users were told that they could use Champlain College shuttles but those aren't convenient to people on the UVM campus. Because of the limited access, the Pine Street spaces are similar to a warehousing TDM instead of a park and ride TDM. In fact, CATMA refers to the Pine Street lot as “warehousing”. (Exhibit 25A)

Colchester Remote Park & Ride is only on-paper and is a forecast for 2025

When I asked CATMA for details about the 200 parking spaces that UVM plans on leasing in Year 2025 in Colchester, I was told that UVM is in the assessment phase for this site and has not yet worked out the details of who will work there, what access to one's car will be, and what shuttle service of any will be provided. (Exhibit 25B)

I suspect that the Pine Street and Colchester parking spaces are being used in the JIPMP to boost UVM's parking supply on paper in order to show a parking surplus in the JIPMP and obtain from the DRB a 5-year parking waiver for Years 2020-2025. Without these off-site (and inactive) parking spaces, the mid-point of UVM's estimate for its net parking supply would be a negative number (parking deficit).

I have the impression that the JIPMP was tailored to create an on-paper appearance of a parking surplus – one that doesn't actually exist

I also believe that UVM would prefer to use on-street parking and never have to use these off-campus lots. (Exhibit 26) These parking spaces may be an accounting plug in the JIPMP calculations that will go away if/when the city increases public access to parking on streets near UVM.

Why won't UVM adopt and grow a remote (outside of Burlington) park and ride TDM program sooner than Year 2025?

To the greatest extent possible we need UVM to implement asap a remote (outside of Burlington) park and ride program in order to reduce the number of SOV.

For example, Apple provides its employees who live up to an hour away with Apple shuttle (bus) service between their hometown and Apple's Cupertino campus. Only Apple employees can board the shuttles. The shuttles have WIFI. The shuttles are very popular with Apple employees and people make housing choices based on the location of shuttle stops. My guess is that UVM needs to provide shuttle service between remote towns and campus in order to create a successful satellite park and ride program.

A large and successful UVM remote park and ride program **would benefit UVM** and also accomplish many of the same objectives that that are mentioned in CDO Article 8 and planBTV:

- Reduce demand for parking permits
- Reduce UVM's daytime on-campus parking demand,
- Eliminate UVM's daytime parking deficits (Exhibit 1)
- Reduce traffic on-campus and on streets next to and near campus
- Increase safety for pedestrians – especially at the top of Main Street near Davis Center
- Increase use of bicycles for transportation because everyone feels safer bicycling if there is less traffic and space near the curb for the bicyclist.
- Increased bicycle use can reduce demand for UVM's on-campus shuttles that cause pollution and expense and don't reduce car usage for on-campus travel
- Reduce the number of cars that are on campus overnight and thereby free-up on-campus parking spaces for PFG's evening event parking demand
- Prevent evening parking deficits that will otherwise occur when UVM hosts large PFG events (Exhibits 5 to 7)
- Reduce use of on-street parking by UVM students, employees and visitors (city, and bicyclists, and neighborhoods near UVM benefit)
- Help UVM avoid the cost of building another garage.

Hence, if UVM starts and grows a significant and remote (outside of Burlington) park and ride program, that would be superior to on-street parking and superior to new garages in advancing the municipal objectives (CDO Article 8 and planBTV). If UVM creates a significant park and ride program, it will not be necessary for UVM to build new garages or expand existing parking lots or use on-street parking.

Even though planBTV and CDO Article 8 recommend the satellite park and ride TDM, UVM might be seeking to avoid the expense of implementing a robust park and ride program

because using on-street parking to supplement its on-campus parking supply would be the least expensive parking solution for UVM.

STRATEGIC POLICY CHOICES & DRB REVIEW DECISIONS

If UVM doesn't gain access to on-street parking near campus, and if UVM starts a successful and significant remote park and ride TDM program, then there will be no need for UVM to build parking garages and larger parking lots on the perimeter of its campus; and all of the objectives listed above will be advanced.

However, if the public gains more access to on-street parking near UVM, UVM will have less incentive to ever begin, promote, and grow a remote park and ride program even though it would benefit the broader community. All of the harms that Article 8 is trying to prevent will occur and be permanent.

Question 5: Is there anything the DRB can do or say to convince or require UVM to get serious about a remote park and ride program?

Question 6: Can the DRB require as part of the JIPMP reporting process and CDO Article 8, section 8.1.15, item 3F, that UVM provide in all future JIPMP (annual and 5-year) reports detailed information regarding:

- UVM short and long-term parking strategies
- UVM progress with growing a remote (outside of Burlington) park and ride program
- UVM's parking space supply and demand situations when it hosts different size large events (3,000 attendees or more) or multiple events of 1,500 attendees /event in the evening and also on weekend days.

Question 7: If UVM receives a parking waiver as a result of the JIPMP 2020-2025 review, will UVM have more flexibility later to cherry-pick the locations for future garages and lot expansions? The cherry picked location might not necessarily within 1,000 feet of the project that received the parking waiver. Will UVM use this timing strategy to implement its perimeter parking plan? What can the DRB do to prevent UVM from building garages (or expanding parking lots) along residential streets?

DISADVANTAGE TO CITY OF 5-YEAR JIPMP parking waivers is that data is old and outdated when the 5-year old data is used to obtain a zoning/building permit.

23. In 2018 when UVM was requesting a permit and parking waiver from the DRB for the PFG project, UVM referred to the 2014-2019 JIPMP which mentioned the old design concept for the PFG Complex. In the old design, concurrent use of venues was not envisioned because the venues were not to be adjacent to each other. However, by March 2017 UVM had information about the new seating capacity for Gutterson (as well as the rest of the PFG building) and the UVM Athletic Director mentioned to the UVM Board of Trustees the additional 2,000 seat capacity in Gutterson and the opportunity to host up to 6,300 spectators in Gutterson. So,

when UVM was before the DRB in 2018 to request a permit for the PFG project, it seems that UVM should have disclosed to the DRB the news that Gutterson's seating capacity was increasing and that this would increase parking demand and traffic. But UVM did not disclose Gutterson's increase in seating capacity. UVM's comments to the DRB in 2018 were:

- "The seating capacity will not change, so the need for parking spaces will not change."
- "There will be no net addition of spectator seats"
- "As there will be no increase in spectator seats, no traffic analysis has been provided or is required for this application"
- "No new vehicular traffic is expected as a result of this project."
- "The two event spaces will not be used concurrently for spectator events."
- Exhibit 27

This is a good example of why 5-year parking waivers should not be granted. The carrot/stick of 5-year parking waivers vs CDO parking space requirements creates too much incentive for UVM to not disclose new information if it doesn't help UVM's position when UVM is before the DRB with a permit application or a 5-year JIPMP review.

I encourage the DRB to consider what can be done to encourage UVM to provide accurate, full, and transparent disclosure of facts in its JIPMP. The carrot/stick tradeoff may be the reason why UVM did not disclose to the DRB the 2,000 seat increase in Gutterson's total seating capacity when requesting a permit and parking waiver for the project. Also, Gutterson's increase in seating capacity was not mentioned in the 2018 JIPMP update, nor in the 2018 JIPMP update, nor in the 2019-2024 JIPMP published in May 2019. (Exhibit 28)

Do we need to revise the criteria for earning a 5-year Institutional Parking Waiver ?

If an institution (UVM) doesn't have adequate parking, my impression of CDO Article Section 8.3.5 is that it seems to require the institution to build more parking spaces to satisfy the requirements of Table 8.1.8. In my opinion, these cited sections don't focus enough on creating and growing remote (outside of Burlington) park and ride programs in lieu of building parking lots and garages. It might be productive for the city to amend Section 8 in order to address this. For example, if Article 8 required UVM to pass the following four (suggested) criteria, then providing UVM with a parking waiver would reduce SOV miles and pollution, protect neighborhoods adjacent to campus from adverse impacts due to UVM's parking demand and traffic, and eliminate UVM's parking deficits.

1. Zero use of on-street parking
2. Significant progress in having at least 50% of UVM's drivers use remote (outside of Burlington) park and ride lots on a daily basis;
3. No on-campus parking deficits during daytime hours or during PFG events
4. A utilization rate of no more than 85% (effective capacity) for on-campus parking lots

Thank you for considering these comments.

Sincerely,
B. Headrick