

Appendix 3 of PB-43-19

City Wide Parking Study Public Comments

November 28, 2016



Rosalind Minaji
City of Burlington
426 Brant Street,
Burlington, Ontario
L7R 3Z6

Attention: Ms. Minaji

RE: City of Burlington Parking Study

Thank you for the opportunity to review the City of Burlington City Wide Parking Study. As a conscientious land owner with multiple sites within the City of Burlington, Adi commend the City for recognizing the need to review and address their current parking standards, especially at a time when the City is undergoing such a fundamental shift from Greenfield Growth to Growth within its Built Boundary. This study is vital to the future growth and development of the City. Although we are aligned with the City and the intent to lower parking rates, we do have concerns with the recently prepared Parking Standards Report.

Below is a list of our general and specific concerns:

1. It appears there was background study used to generate the conclusions proposed within this report. Can the background study be released to the development community for our review? Specifically survey data that was collected (What methodology was used to collect data?).
2. Section 1.1.2 of this report evaluated the correlation between housing prices and the impact on parking requirements. The conclusion of the report recommended that housing prices did not influence parking standards for residential uses.
 - a. Instead factors such as a decline in automobile ownership, ride-share programs, flexible zoning, cost of underground parking, number of bedrooms per unit, etc. were concluded to be a direct impact on parking demands.
 - i. How were the above factors evaluated? Did this review go beyond an anecdotal review?
 - b. The recommendations provided in this report were based on the evaluation of existing requirements, peer comparisons, ITE and spot surveys. How is the City anticipating the future changes in modal split?
3. Section 1.1.3 Detached/Semi-Detached/Duplex/Triplex – Why were no surveys collected for this section?

- a. Duplex/Triplex – are very different built forms than a detached or a semi unit. These built forms should be evaluated separately.
4. Section 1.1.5. Back to Back and Stacked Towns – we are in agreement that this section should be separated.
 - a. Can you confirm which Back to Back townhouse sites were surveyed for this section? Did these sites have various built forms within the site?
 - b. What methodology was used to survey?
5. Section 1.1.7 Apartment – we would like to see the spot survey data that was collected for this section.
 - a. Why are the recommended numbers so much higher than the observed?
6. In general, the recommended parking rates are high compared to many of the spot surveys that were completed for the respective land uses.
7. In general, consideration of the existing by-law and peer municipal parking requirements are given the same weight as survey data. The existing and the peer requirements may not reflect the latest trends in auto ownership, the aging demographic and income levels.
8. In general, it is our opinion that survey data should be more heavily weighted than existing by-law or peer requirements, as this information is the most up to date local data for the City's parking demands. In addition to the above, more extensive surveys of parking demands across different product types would be beneficial to this report.
 - a. Although survey data is the most recent and up to date information available, what is being done to take into consideration the future changes in transportation within the City?
 - b. What were the City assumptions on TDM for these surveyed communities?
9. As the City has made a conscious decision to plan for a City that is growing up rather than out, our suggestion would be to review parking demands every 2 years.

It appears this report is part of a larger report and therefore we look forward to reviewing and commenting on future sections and updates.

If you have any questions, please feel free to contact me.

Sincerely,



Shane Cooney
VP of Development
ADI Development Group Inc.
W: 905-335-2929
E: shane@adidevelopments.com

Minaji, Rosalind

From: Doug Benton
Sent: Thursday, September 28, 2017 8:25 PM
To: Minaji, Rosalind
Subject: Parking Standards

Hello,

I am trying to understand why we set parking standards for commercial property (in in this category I include condominiums and rental residential properties as well as retail and entertainment complexes).

Why do we not simply let the owners/developers decide how much parking they want to provide? Allow them to make a business decision, based on their understanding of their customer base and their assessment of the costs/benefits/risks of providing too much or too little parking.

In the case of condominium and rental developments, if the developers provide too much parking they will simply reduce their profit by having unsold parking spaces. If they do not provide enough parking, they will lose customers, or have to lower their prices when buyers find that they will have no place to park their cars and they have to sell a car or pay for parking elsewhere.

In the case of retail establishments such as entertainment complexes, big box stores, grocery stores, shopping malls and strip malls, if they provide too much parking, they reduce the amount of space available for shopping and display space. If they don't provide enough parking spaces, they lose customers who instead go to where they can find parking space. It is their decision, and they carry the can if they make the wrong decisions. They may decide that they will build a parking structure, or not, but that would be their decision.

So, why does Burlington interfere in the business decisions of private sector businessmen?

I would appreciate your responses.

Thank you.

Doug Benton

Minaji, Rosalind

From: J Andreal
Sent: Tuesday, October 17, 2017 12:07 PM
To: Minaji, Rosalind
Subject: Residential parking rules

To whom it may concern,
I believe there should be more stringent rules re: residential parking. For example, in Alton Village single family homes have 2 parking spaces on their driveways and garage space to fit 2 small to medium sized vehicles. I have a neighbour who tends to park his vehicles on the street, not making use of his own property parking spaces. He does this to prevent parents from parking near his home, who are simply picking up children or dropping them off from daycare, carpooling, babysitting, etc. He feels the street adjacent to his home belongs to him, not the city. When parking on the street with no valid reason, he has created a dangerous traffic bottleneck many a time. When he was issued a ticket, he then found a loophole in the city's bylaws and swapped his cars on the street every five hours... he owns 2 cars. Why is this loophole not closed? Alternately, he would move his car slightly up or down from where it was parked every five hours. He is beating your parking enforcement system, so to speak. Only lately has he stopped playing this parking game for whatever reason, but this is a matter I would like the city to address. Unless there is work being done to your driveway, to your property, or you have guests which exceed the available parking slots on your property, there should be no on street parking. If there is a 5 hour exemption, ensure it stays at five hours, no more. Do not allow swapping of cars every 5 hours or allow a resident to move his car slightly so that he parks another 5 hours. Let us not allow this type of inconsiderate and devious behaviour to continue. Just some food for thought for your parking review, which I hope you will consider seriously.

Regards,
J

Minaji, Rosalind

From: Nikolas Papapetrou
Sent: Wednesday, October 18, 2017 10:43 AM
To: Minaji, Rosalind
Subject: City of Burlington Parking Study

Good Morning Rosalind, I hope you have been keeping well. We have reviewed the final parking study report by IBI as well as the staff recommendation report dated Sep 25, 2017.

Firstly, can you kindly add my name to the interested party list so that I can receive future notifications on this study?

I have a couple of questions as it relates to the recommendations of the consultant.

1) Minimum and Maximum parking rates are recommended for Retail Centres located within Intensification Areas. Can you confirm what constitutes an intensification area? I understand the proposed OP establishes Primary and Secondary Growth Areas. Will the new parking requirements be tied to these?

2) If a property is subject to a site specific parking rate. Will this rate continue to prevail?

3) With respect to EV charging stations. The report is recommending that roughed in provisions for 10% of the parking spaces be provided for all other land uses (not referenced in the report). Can you provide some direction as to what roughed in provisions mean? In our experience, the installation of EV stations (after the fact) has minimal impact to the site. Further, the bulk of the cost is related to the required charging equipment. We do not understand the benefit of this requirement.

Thank you.



Nikolas Papapetrou MCIP, RPP | Land Development Associate
P: 905-326-6400 ext. 7276 | F: 905-760-6220 | C: 416-873-1214
700 Applewood Cres., Suite 200, Vaughan, Ontario, L4K 5X3

Please Note that my email address has now changed to "npapapetrou@smartreit.com", and our main phone number is 905-326-6400. Please adjust your address books accordingly.

This message is intended for the addressee. It may contain privileged or confidential information. Any unauthorized disclosure is strictly prohibited. If you have received this message in error, please notify us immediately so that we may correct our internal records. Please then delete the original message. Thank you.

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Minaji, Rosalind

From: noreply@burlington.ca on behalf of Maureen Letang
Sent: Wednesday, November 01, 2017 7:12 AM
To: Minaji, Rosalind
Subject: Parking review input

Hello,

I have lived in Burlington for 21 years and I love it here with one exception and that is the unnecessary on street parking limitations and hassle that exist. I realize the three hour parking max has increased to 5 hours which is somewhat better but my argument is avtown like Burlington has just been encouraging thousands of home owners to cut down trees and pave their grass so that they can park on their driveway when necessary as opposed to on the street. I have been to most cities across Canada and this rule just doesn't make sense. We have been told it is for child safety which if you look at other cities, there are no increase in road incidents with children. I remember having to get an exception due to our driveway being redone and the parking office treated me like a child. Why was I having this done? Utterly ridiculous. Having to call in every time someone sleeps over is a waste of my time and my tax money funding the people in that department. I must end there as I probably have to go move a car.

Origin: <http://www.burlington.ca/en/services-for-you/City-wide-Parking-Review.asp>

This email was sent to you by Maureen Letang through
<http://www.burlington.ca>.

Minaji, Rosalind

From: noreply@burlington.ca on behalf of Mike Fox |
Sent: Monday, November 20, 2017 7:38 PM
To: Minaji, Rosalind
Subject: New Parking Standars Report

I see they plan is to reduce the number of parking spots in several areas. This makes no sense as there are more cars then ever on the roads today, and may places don't have enough parking spaces with the current standards.

Origin: <http://www.burlington.ca/en/services-for-you/City-wide-Parking-Review.asp>

This email was sent to you by Mike Fox _____ a> through
<http://www.burlington.ca>.

Minaji, Rosalind

From: noreply@burlington.ca on behalf of Chris Ariens
Sent: Wednesday, November 22, 2017 1:48 PM
To: Minaji, Rosalind
Subject: Parking Review

Comments:

In general, I would prefer to eliminate parking requirements and enable the free market to determine the need for parking supply, especially in the Downtown where space for parking is constrained and parking requirements greatly reduce the possibility of good quality infill development. We cannot build anything like the best parts of the city today and parking requirements are largely the cause of this.

<https://www.strongtowns.org/journal/2017/11/21/how-parking-minimums-hinder-small-scale-developers>

<https://www.strongtowns.org/journal/2017/11/20/parking-minimums-must-die>

<https://www.strongtowns.org/journal/2017/11/20/we-forbid-what-we-value-most>

<https://www.strongtowns.org/journal/2017/11/20/mapping-the-effects-of-parking-minimums>

1. Why different standards for stacked townhouse vs. other townhouse?
2. Increasing apartment parking requirements for larger # of bedrooms will discourage developers from building family-sized units. Burlington has a tremendous deficit in terms of families wanting to live here. Policy will penalize families that want to be multi-modal or rely on a single car.
3. Agree with reduction in minimums for supermarket. This will be required if Aldershot is ever to get a grocery store. Could even go further to same as service commercial (4/100m2 GFA)
4. Restaurant requirements still too high. Prevents restaurants from competing with alternatives i.e. food trucks which have no parking requirement. Downtown should not require dedicated parking for restaurant uses (patrons can use on-street, off-street or garage).
5. Parking lot / paved area should be used to determine stormwater runoff charges.
6. Parking in condominiums and apartments should be required to be separate from the purchase price / rental fees for the units and not included in general condo fees.

Origin: <http://www.burlington.ca/en/services-for-you/City-wide-Parking-Review.asp>

This email was sent to you by Chris Ariens through
<http://www.burlington.ca>.

Minaji, Rosalind

From: Doug Benton
Sent: Monday, December 04, 2017 8:07 PM
To: Minaji, Rosalind
Cc: Alan Kirkpatrick; Rob Proctor; Palermo, Lisa; Lytle, Judi; Tricia Pokorny; LaPointe, Amber
Subject: Parking Standards Review Report

Hello,

I am writing to express my opinion of the following statement in the report:

Based on the review, Burlington's current accessible parking standards require more accessible parking in larger parking lots and less accessible parking for smaller parking lots compared to AODA guidelines, and standards in St. Catharines and Toronto. **It is recommended that Burlington's accessible parking standards be amended to match the requirements outlined in the AODA guidelines.** These standards are outlined in Exhibit 7.2.

I did not see any evidence in the report to support such a recommendation to reduce accessible parking in Burlington. I think that **the part that I have bolded should be deleted**, as the recommendation is totally counter to the reality of how the population of Burlington is evolving. Considering that the number of seniors in Burlington is increasing, and is therefore contributing to a situation where a larger segment of the Burlington population will require accessible parking, **the number of accessible parking spaces should be increased, not decreased.**

There should be no decrease in the required number of accessible parking spaces. An increase would make more sense.

Doug Benton



December 19th, 2017

Delivered By Email

City Building Department
City of Burlington
426 Brant Street
Burlington, Ontario

Attention: Mary Lou Tanner, Director of City Building

Dear Mary Lou:

Subject: 2017 City-Wide Parking Study ("study")
Report PB-65-17 & Final Report: Burlington City-Wide Parking Standards
Review – Consolidated Report

As you are aware, Carriage Gate Homes is an active participant in the local development industry. We have reviewed the above-noted reports and are concerned that, if implemented as currently proposed, will result in a number of significant and harmful consequences.

Firstly, it is important to recognize that when the City of Burlington commenced its City-Wide Parking Study, the intention was to review parking rates, with a special effort being given to reducing minimum parking standard requirements which is intended to significantly and positively reduce auto dependency, especially within the City's primary growth areas, including the Downtown. The conclusions and recommendations contained in the reports clearly fail to reflect the original intent.

Background:

Subsequent to the Province of Ontario designating parts of Downtown Burlington as an **Urban Growth Centre** in 2006, the Province has produced a number of additional documents that include and provide policy directions and guidelines to assist municipalities in future planning efforts that are intended, in part, to reduce auto dependency and promote the use of public transit.

We would like to draw your attention to "**The Big Move – Transforming Transportation in the Greater Toronto and Hamilton Area**" that is intended to implement the "**Regional Transportation Plan**". This report is to be read in conjunction with a related "**Backgrounder Report - 2008**". You will note that Appendix B to the Backgrounder Report identifies Downtown Burlington as an "**Anchor Mobility Hub**". Anchor Mobility Hubs within the Urban Growth Centre are focal points with the potential to transform urban structure and improve transit. Areas so designated are expected to experience significant change.

Appendix B identifies a significant portion of the downtown as an Anchor Mobility Hub ". Anchor Mobility Hubs are noted as being focal points with the potential to transform urban structure and improve transit. Recognition of this designation by the City of Burlington is not only significant but is required. Although the City of Burlington is unable to confirm the scale and magnitude of redevelopment and intensification that is being planned for the Downtown Mobility Hub Precinct

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Phone 905.637.8888 Fax 905.333.9640

Plan area by 2031, we do have a number of serious concerns with the recommendations included in staff report PB-65-17 and the IBI report.

While we appreciate that the City of Burlington is to ensure that adequate parking is provided to accommodate need, we are concerned that the recommended parking and design standards will result in an over-supply of parking within the Urban Growth Centre leading to an insufficient use of land and financial resources and is in many aspects counter to many well-established smart growth principles intended to reduce auto dependency.

The following, although not to be considered as comprehensive as growth information is not available from the City at this time, provides a summary of several of our concerns regarding minimum parking requirements in mixed-use redevelopment and intensification projects within the City's only Urban Growth Centre - portions of the Downtown.

New Draft Official Plan:

We are very concerned that the proposed new planning policy framework included in the recently released second version of the proposed New Official Plan for the City of Burlington (including the Urban Growth Centre and the portion of the Downtown that is included within the Downtown Mobility Hub Precinct Plan) fails to:

- appropriately recognize the significance, role and function that the Anchor Mobility Hub is intended to satisfy; and,
- provide land use policies to effectively promote and enhance the existing and future role and function of the Anchor Mobility Hub (within the City's urban structure and intended role within the GTHA).

The failure of the City to adequately consider and address these matters is reflected in the IBI report and PB-65-17.

Recommended Parking Rates:

Table One: Summary of Proposed Parking Rates, IBI Report July 2017 - provides new proposed parking rates that are recommended for approval and implementation. Within the Urban Growth Centre, the residential component of redevelopment and intensification apartment projects is proposed to remain at a minimum of 1.0 parking spaces per apartment unit.

The Urban Growth Centre is the City's primary intensification area (including the City's only Anchor Mobility Hub) and auto dependency reduction is a fundamental goal. We are concerned that the proposed minimum resident parking rate is higher than necessary and should be reduced to reflect an emphasis on reducing auto dependency.

Although the proposed minimum resident parking rate of 1.0 is consistent with the City's current standard, the City has promoted higher parking rates in other recent development application reviews. The City of Burlington should not require increased parking rates as efforts to do so are counterintuitive and fail to reduce auto dependency.

Secondly, Table One also proposes a new visitor parking rate requirement. The City is recommending that a new minimum visitor parking rate of 0.25 parking spaces per residential unit be provided. This is a dramatic departure from the City's existing parking standards and is contrary and counterintuitive to accepted parking principles in other municipalities in the GTA.

There is an existing and abundant supply of public parking within the Urban Growth Centre and a requirement to include additional dedicated visitor parking spaces will result in significant new development costs and under-utilized parking spaces. While we acknowledge that some people may have a preference to be able to park on-site or immediately adjacent to a particular building, this is an onerous and unrealistic requirement in an urban setting.

Cash In Lieu of Parking:

Section 3.4.6 of the IBI report discusses "cash in lieu of parking" as a parking management tool used in municipalities. Carriage Gate Homes strongly opposes this approach in the City of Burlington.

Car Charging Stations:

Section 7.3.3 of the IBI report recommends that 30% of all resident parking spaces in mixed-use development include roughed in charging stations and further that 20% of all visitor parking spaces in mixed-use building provide roughed in charging stations. We do not support this initiative as the City has provided insufficient and inadequate information upon which we can evaluate this request. It appears that many of the recommendations in the IBI report are based on best practices and are not based the needs of the City of Burlington. Please clarify the City's rationale and implementation expectations in respect of this matter.

Car Share:

Section 7.4 of the IBI report is recommending that community car share service be provided in new mixed-use developments. While this is a genuine effort intended to reduce auto dependency, a defined network of auto share providers does not exist in Burlington. Therefore, although car share may be a goal, it should not be a mandatory City requirement. We support car share as a legitimate and well-intentioned objective but cannot support it as a requirement for all new mixed-use developments.

LEED:

LEED certification and parking requirements included in section 3.4.3 of the IBI report are contradictory and unacceptable. On the one hand, the City wants to increase minimum parking rates and on the other wants LEED compliant buildings with reduced parking rates. The City of Burlington cannot have it both ways. Please review and clarify the City's preferred direction.

Unbundled Parking:

The City of Burlington is also proposing that the sale of parking spaces in mixed-use developments be unbundled. Again this contradicts the City's requirement to add more parking as the main purpose for unbundling parking is to reduce parking supply and auto dependency. Please keep in mind, within 905 it is typical that parking spaces are sold with units. To require future mixed-use developments to unbundle parking would also have a significant and detrimental impact on sales and the economic viability of future projects.

Proposed Parking Space Dimensions and Area:

Section 8.2.1.4 of the IBI report recommends that in certain circumstances that parking space sizes be increased. Minimum parking space dimensions in the City of Burlington are already greater than many other municipalities in the GTA and this requirement is inefficient, unwarranted and adds additional costs to the parking supply and ultimately the consumer. We do not support this proposed change. Minimum parking space dimensions should be reduced as the size of vehicles is actually consistently decreasing. Please refer to Exhibit 8.6 of the IBI report. You will note that the minimum parking stall sizes and minimum area for parking spaces in Burlington

already exceed all other municipalities referenced in the exhibit. Increases to the minimum size and dimension of parking spaces is un-necessary and inappropriate. The minimum size of parking spaces should be reduced.

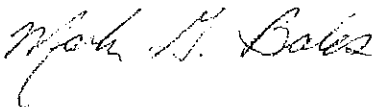
Conclusions:

As noted above, there are many serious flaws in the recommendations included in the IBI report and staff report PB-65-17. The staff report and the consultant's report fail to implement the original intent of the initiative to reduce auto dependency. Both of the reports contradict each other and the recommendations are actually contrary to the Provincial Growth Plan and its direction to reduce auto dependency.

The recommendations made in respect of minimum required parking supply, visitor parking, car sharing, car charging stations and minimum parking space dimensions are counter to many well-established smart growth principles intended to reduce auto dependency and adversely impact the development industry. As such, these recommendations should be rejected.

Please consider these comments and advise of all future proceedings in respect of this City-wide initiative.

Yours truly,
Carriage Gate Homes



Mark G. Bales, MCIP, RPP

To: parkingreview@burlington.ca

To: Marianne Meed-Ward

To: Vito Tolone

Subject: City-wide Parking Standards Review

Date: December 28, 2017

Forward:

I would like to offer the following comments on the proposed parking requirements, and especially the parking needs for Apartment Buildings/Tall Buildings. Since HSCC608, a.k.a. "The Strata", located at 551 Maple has been used as a proxy by both the city and parking consultants. I will also address the use of those studies within my comments. As well I wish to acknowledge that the writers' comments are based on personal observations and formal audits conducted by the writer at this address.

Resident Parking Narrative

The **421 - 431 Brant Street Transportation Impact Study, Parking Study and TDM Options Report, 6.10.1 Strata (551 Maple Avenue, Burlington), (Page 62)**, erroneously states parking at 551 Maple as, *"....223 plus 18 tandem spaces provided in an underground parking structure and 47 surface parking spaces for use by visitors...."*. For the record, the **Declaration and Description** for HSCC608 indicates there are 225 resident parking spots at this location, of which 18 are tandem spots for a total of 225 spots, 8 of which are surface spots, resulting in a ratio of 1.21 spots per unit. When you include tandem spots as 2 spots versus 1 spot, the total available resident parking spots at this location would be 234, yielding a combined ratio of 1.251 spots per unit. As well HSCC 608 has 47 visitor spots, 2 of which are "accessibility" spots, yielding a combined ratio of .253 spots per unit.

It is also important to note that in Ontario, condominiums must be registered to come within the jurisdiction of the Condominium Act. A registered **declaration and description** contains the common interests of each unit, a list of the exclusive use common elements for condo units, a list of the common elements, as well as a statement of the shared common expenses for the common elements. The schedules to the declaration must include, among other things: a legal description of the land, the boundaries of each condo unit (which also includes the parking spot(s) associated with each unit), and any specifics regarding unit boundaries. The description component contains the survey plans and architectural plans of the building along with an architect's certificate.

Resident Parking Spots and Parking Demand (Registered Condominiums)

With regards to registered condominiums parking spots and parking demand, the writer would like to call your attention to the fact that resident parking spots are attached to a unit by way of title. I mention this is as all Tall Buildings are not necessarily registered condominiums.

Local proxy studies have cited parking demand at 551 Maple at 80%. Example, the **421 - 431 Brant Street Transportation Impact Study, Parking Study and TDM Options Report** (page 62), states that during the survey period, *“...The parking survey indicates that residential parking demand at Strata was calculated at 0.80 parking spaces per residential unit”*.). Parking demand or perhaps more appropriately, occupancy, at the time of a survey may be 80%, however, these spots are in fact not available to anyone other than owner(s) of the spots.

Conclusion

The use of “demand” for study and proxy serves no purpose other than to identify the fact the owner(s) of a parking spot were not “occupying” their rightfully owned parking spot(s) during the survey period. Therefore, the utility of such studies to determine the right number of resident parking spots for new builds is questionable at best.

Recommendations Resident Parking

- (1) The number of required resident parking spots for Tall Buildings should not be based on the occupancy of proxy sites.
- (2) Where condominiums are concerned, the number of resident parking spots at proxy sites should be based on the number of spots identified in the declaration and not the demand based study results.
- (3) Consider adopting a formula for Tall Buildings that is based on the number of bedrooms i.e. 1 BR = 1 spot, 2 & 3 BR = 2 spots.
- (3) Add a “Tall Building” category to the **Recommended Parking Rates Intensification Areas to “Land Use Types”** chart with the following Max rates: 1BR: 1.25 spaces/unit, 2BR & 3BR: 1.5 spaces/unit and V.25 spaces/unit.
- (4) Add an Accessibility column to the **Recommended Min Max rates** chart.
- (5) Ensure resident accessibility spots are not attached to units.
- (6) In addition to the above, establish a ratio for accessibility spots (i.e. accessibility ratio for a 160 residential building could be 3% of units or approximately 5 spots.
- (7) Reassess the terms, conditions, and use of resident parking demand studies for proxy sites for new builds.

Visitor Parking Narrative

Whether tall buildings have visitors or not is not debatable, they do. What is up for debate and analysis is how many visitors can be expected, how long do they stay, where do they park, where do they park when they stay overnight and particularly during the winter months? The factors that drive visitor parking for Tall Buildings are the same factors that drive visitor parking for detached homes. The building located at 551 Maple Ave, is often cited as a proxy site in traffic studies undertaken by the city of Burlington and developers to justify the amount

of parking that will be made available for owners and visitors.

Appendix A Terms of Reference, of the **421 - 431 Brant Street Transportation Impact Study, Parking Study and TDM Options Report** contains a series of communication emails between the City of Burlington and Paradigm Transportation Solutions. The terms of reference are cited on page 6, “*...The survey should occur two to three days per week for two consecutive weeks and should not take place over the holidays...*” and “*...The survey must capture total parking demand related to the use, inclusive of visitor parking. Vehicles parked illegally or off-site are to be recorded separately and considered as part of overall parking demand...*”. Limiting the study period to weekdays introduces a bias and misses the significance and magnitude of visits at other times. The writers’ submission to the OMB, regarding the 374 Martha St development, included a visitor parking utilization study at 551 Maple, for the month of September of 2016. The results of the survey are as follows:

Observation methodology	Results
Number of random observations = 102	Maximum occupancy = 37 spots
Number of consecutive observation days = 29	Minimum occupancy = 4 spots
Hours of observation = 07:30 to 21:00	Average occupancy = 11.4 spots

According to the study, the minimum visitor demand is 4 spots, the average is 11.4 spots and the peak demand is 37 spots. The writer has also observed occasions where all 47 visitor spots are occupied, usually on holidays such as Christmas and during events such as Rib Fest and the Sound of Music Festival.

Other issues aside, one would expect visitor parking demand for developments being contemplated such as 374 Martha and/or 421 Brant to be similar to 551 Maple. As well, but not noted in the above, of the 102 observations, 16 or 15.68 % were visitors with accessibility needs, and 17 or 16.67% were service vehicles.

Page 59 of the **421 - 431 Brant Street | TIS, PS and TDM Options Report |**, contains the following statement, “*the MMM Group study has recommended that the City investigate the feasibility of providing additional parking garages with the preferred location at the intersection of Elizabeth Street and Pine Street to address the possibility of infill developments*”.

Page iii of the **374 Martha Street, Burlington | Parking Justification Study** contains the following, “*A substantial supply of existing private parking lots within the area could be utilized by visitors and/or patrons of the retail uses if additional parking is required..... Additional parking should be available throughout the study area during periods of average parking demand and it is likely that demand for parking related to the development will occur outside the observed parking demand peak*”. Both

studies fail to capture the magnitude of the demand peaks that occur and especially weekend and holiday peaks that have not been studied by the city or by developer parking study consultants. In essence it appears as though developers expect the city to absorb the cost of peak parking demand at no cost to them.

Conclusion

If 551 Maple is a proxy for such developments one would expect a similar demand for visitor spots in like buildings. Visitors to buildings with “0” visitor parking spots have no choice but to find parking somewhere in the area and are forced to utilize public parking spaces.

If 551 Maple is an indication of the magnitude of visitor spots that are required at peak, the city can expect the same additional demand of between 35 to 45 visitor spots, per Tall Building, on weekends, holidays and special events.

Recommendation:

Where no or limited visitor parking is offered by developers, Section 37 agreements should address the impact of visitors on the existing parking inventory and infrastructure and seek economic recovery equivalent to the number of spaces that are anticipated. Where a Section 37 agreement is not anticipated, the city should consider cost recovery by way of imposing a parking levy, based on a formula like the one employed for the downtown businesses.

Effect of Amenities on Visitor Parking Demand

The, size, number, type and conditions of use, for amenities, is another factor that can have a significant effect on visitor parking demand. The declaration, by-laws and rules of a registered condominium spell out the conditions of use for common areas and amenities. Example, 551 Maple has three amenities that may be rented by owners for social purposes on an exclusive basis. The writer conducted a study of the use of rentable amenities over a 12-month period at 551 Maple with the following results:

Amenity	# Times	#Weeks	Avg/week
Party Room	49	33	1.44
BBQ Lounge	45	34	1.32
Guest Suite	88	36	2.5

Conclusion:

Visitor demand is affected by the size, number, type and conditions of use of amenities creating a surge of demand for visitors from Friday p.m. to Sunday p.m. and during special events held in the community and public holidays.

Recommendation:

Reassess the terms, conditions, and use of visitor parking demand studies to include the effect of weekend demand for visitor spots from Friday p.m. to Sunday p.m. and the demand created by special events held in the community and during public holidays.

Care Share Narrative

Car Share is just one of the strategies being employed to reduce the number of required parking spaces and in the writers opinion will have a minimal effect on parking demand in the near term.

Recommendation

Car Share should be considered as a part of the City's transportation strategy, as such the city should subsidize the start-up of Car Share until such time as a critical mass of users and vehicle availability is present.

Other Recommendations:

- (a) Revisit proxy studies, design principles and premises
- (b) Re-survey the proxy sites to measure weekend and holiday impact.
- (c) Measure or study the aggregate effect of visitor parking demand, that will result from the number and scale of tall buildings that are anticipated within the new Official Plan precincts.
- (d) Accessibility Spots should not be attached to a unit and should be permanently identified as accessibility flex spots. The rationale for this being, a spot may be originally purchased by a person or persons requiring an accessibility spot. However, the next purchaser may not require an accessibility spot and the net result would be a permanent loss of that spot from the accessibility inventory.
- (e) Conduct a study to determine true visitor parking demand that includes the peak demand under all situations including surveying on weekends, public holidays (when demand can surge exponentially).

Conclusion:

In a perfect world, we should be able to park where we want, when we want, for as long as we wish. The aforementioned thoughts were directed towards "Tall Buildings" which according to the Tall Building Guidelines are defined as, "any building over 11 storeys". The context in which I based my comments and personal opinions were based on personal observations resulting from having lived in a tall building since June of 2013. As well the fact that Burlington has a very high ratio of car ownership at .7 vehicles per capita is something that bears consideration by policy makers.

If you were to ask me the question, do we have the right number of resident and visitor parking spots at 551 Maple Ave, it would be a qualified yes. If you were to ask, are the spots in the right hands at the right time, the answer is an unqualified no. I suspect my observations are not unique to our building, and probably apply to most tall buildings.

If you have any questions on the above, please feel free to contact the writer.

Respectfully Submitted,

Joseph A. Gaetan B.G.S

507-551 Maple Ave.

Burlington On.

L7S1M7

Minaji, Rosalind

From: noreply@burlington.ca on behalf of Joe Gaetan
Sent: Saturday, December 30, 2017 1:29 PM
To: Minaji, Rosalind
Subject: Feedback on City Wide parking Standards Review

I would like to add one more remark to the submission I made via email and that is, with respect to the downtown area. It would behoove the committee studying this to wait for a more complete history of parking measurement results that are being accumulated as a result of the recent installation of parking pucks.

Joe Gaetan
507-551 Maple Ave
Burlington ON
L7S1M7

Origin: <https://www.burlington.ca/en/services-for-you/City-wide-Parking-Review.asp>

This email was sent to you by Joe Gaetan <noreply@burlington.ca> through
<http://www.burlington.ca>.

Minaji, Rosalind

From: James Schofield
Sent: Wednesday, January 03, 2018 5:52 PM
To: Minaji, Rosalind
Subject: Parking review comments

Thank you for the opportunity provide feedback on the City-Wide Parking Standards Review.

I must admit I am disappointed this review did not take a more aggressive approach in reducing parking minimums. Ontario's Climate Change Action Plan will eliminate minimum parking requirements in municipal zoning bylaws. As the action plan notes, "minimum parking requirements are a barrier to creating complete, compact and mixed-use communities." With this impending provincial policy, it is somewhat perplexing that the city would choose to tinker with parking minimums at this time rather than taking more decisive action.

In intensification areas, I suggest the city **eliminate parking minimums altogether**. We can expect the province to impose this policy change within the next five years. Why wait? Parking minimums are counter to many of the city's strategic objectives. They impede our ability to build complete communities with vibrant pedestrian-oriented streets, and encourage lower density development that uses land less efficiently.

I would also like to offer a few more specific comments:

- **Triplex.** Why is the intensification area minimum (1.33 spaces/unit) greater than the minimum for detached, semi-detached, duplex, and townhouses? (1 spaces/unit) There does not appear to be any rationale for this difference. Strangely, in non-intensification areas, the triplex minimum (1.33 spaces/unit) is less than other residential forms (2 spaces/unit).
- **Townhouses.** I suggest harmonizing all minimums at 1.0 spaces/unit. The difference between stacked townhouses and back-to-backs is difficult to comprehend. Exhibit 6.10 shows a higher observed use at stacked townhouses than back-to-backs (1.48 vs 0.77), yet stacked townhouses have lesser parking minimums than back-to-backs (1 vs 2). A lower minimum may encourage more pedestrian-oriented design and allow for more efficient land use.
- **Visitor parking.** The greater requirement for visitor parking in intensification areas than other areas (0.25 vs 0.2) is counter-intuitive. Visitors arriving in intensification areas should have more multi-modal transportation options and be less likely to require parking.

Thank you for your consideration of these comments.

Sincerely,

James Schofield



Burlington Accessibility
Advisory Committee



January 22, 2018

Re. Burlington City-Wide Parking Standards Review

To Kaylan Edgecombe and Rosalind Minaji,

This letter is being written on behalf of the Burlington Accessibility Advisory Committee with regard to the Burlington City-Wide Parking Standards Review that has been prepared by IBI Group dated July 21, 2017 (the Study). It is our mandate to ensure that the City is considering people with all abilities to enjoy a barrier free life within the City. Unfortunately, there are several concerns we have identified within the Study that we strongly urge Council to not support in their final considerations for the future parking standards in the City.

It behooves the City to remember that we have an aging demographic and the need for MORE accessible parking will be the only way to ensure a thriving citizenry today and long into the future. Regardless of the city's desire to encourage alternative ways of travel like walking, cycling and taking transit, many people living with disabilities have no alternative but to drive and will continue to need and use accessible parking.

- 1) We cannot support any recommendations that will reduce the number of accessible parking spaces, nor can we support any recommendation that will reduce the size of an accessible parking space. The Study proposes a reduction of the accessible space from 2750mm to 2400mm, a decrease of 12.7 per cent. Accessible vehicles provide a vital lifeline to many in our community and the size of stall is required for safe maneuverability of both accessible vehicles and the mobility devices people may require.
- 2) We also recommend that the access aisles remain at their current widths of 2,000mm to ensure access. The study recommends a reduction in the size of the access aisle from 2000mm to 1500mm, a decrease of 25 per cent. Access aisles are especially essential for individuals who need to deploy an access ramp from their modified vehicle. Often, other vehicles encroach on the access aisle making it impossible to deploy a ramp or get back into a modified vehicle when returning from an activity. Decreasing the width of the access aisle would only make this situation worse.



- 3) We cannot support the recommendation to reduce the number of accessible parking spaces at either seniors' centres, retirement homes, and in particular, medical facilities. We feel it is important to note that the Study evaluated parking use at retirement homes between the hours of 8:00 pm and 11:00 pm, when most residents have retired for the evening and there would be very few friends or family using the visitor's parking.
- 4) The Study has made several comparisons to parking practices in the City of Toronto, which does not provide equal comparison to the City of Burlington due to our suburban reality and greater distances between locations, often with less than adequate transit options. The study fails to indicate whether the residents and visitors in the comparison municipalities are satisfied with the lower levels of accessible parking provided and its ability to meet current and future needs.
- 5) We recommend that all provincially mandated requirements continue to be treated as minimums and that all efforts should be made to provide at least one more spot in all locations than those required by the Accessibility for Ontarians with Disabilities Act (AODA).
- 6) We recommend a concerted effort to address the current deficit of accessible parking spaces in parking lots with less than 166 stalls to align with or exceed the minimum requirements in the AODA.
- 7) We strongly recommend updated signage for accessible parking spaces that would identify the by-law number and indicate the fine amount that would be issued for misuse of accessible parking spaces. The signage should include the telephone number to call when a parking infraction is taking place.
- 8) We strongly recommend the City mandates an alignment of the number of accessible parking stalls to the number of accessible apartment units in new build apartment/condominium locations to ensure residents have a 1:1 ratio of parking to living. The current Ontario Building Code requirement is to have 15 per cent of new units in new multi-unit housing be built to be barrier-free, yet parking requirements are equal to only 3 per cent. Multi-unit apartments and condominiums are the only potential accessible housing stock being constructed currently in Burlington.



Burlington Accessibility
Advisory Committee



Burlington's accessibility efforts have garnered it praise and recognition from across the province about our commitment to not meet minimums, but to strive for greater inclusiveness, and the Study recommends we take a step back from that position.

The Burlington Accessibility Advisory Committee strongly urges council to ensure the current protections that have been established in the zoning by-law for parking facilities of 166 spaces or less are at least maintained and that the requirement for parking facilities greater than 167 spaces be aligned with the regulatory requirements of the Accessibility for Ontarians with Disabilities Act as a minimum or even increased to ensure a vibrant Burlington for all of our visitors and our citizens.

Sincerely,

The Burlington Accessibility Advisory Committee

June 1st, 2018

OVERVIEW

The City of Burlington's current parking standards are more than 30 years old. To ensure that the city's parking requirements correctly reflect the transportation demands and emerging trends being seen throughout the city (ex. technology enhancements, public transit options, intensification and infill development, etc.) the parking standards have been reviewed and updated. The city hired IBI Group in December 2015 to conduct a City-wide professional assessment of parking rates and standards in Burlington; the IBI report was finalized on July 21, 2017. The report was received by Council on September 25, 2017 and City staff was directed to work with the public for feedback and comments on the report with recommended rates presented back to Council in the New Year (2018).

The IBI Group report breaks down their review process, findings from historical data and best practice reviews as well as their proposed recommendations for Burlington's City-wide parking standards into the following categories;

- **Background Research** – Reviews of current and historical parking standards, best practices and observations.
- **Data Collection** – 400 parking surveys at times of peak and typical parking demand periods were conducted over 30 types of land uses and 70 different survey sites.
- **Parking Design Guidelines** – Based on best practice, observations and past experience, design guidelines were developed for factors including:
 - Parking stall dimensions
 - Vehicular and pedestrian circulation
 - Underground parking design
 - Bicycle parking rates
 - Barrier-free parking
 - Landscaping
 - Lighting
 - Permeable pavement
- **Proposed Parking Standards** – Broken down into the different land use requirements for parking for easy review and understanding of proposal.
- **Addition Parking Considerations** – Reviews and recommendations were made to ensure that the City of Burlington "provides real and attractive choices outside of the car" (New Official Plan excerpt) for the following:
 - Bicycle parking
 - Accessible parking
 - Electric vehicle parking
 - Car share
 - Transportation Demand Management
 - Shared parking
- **Parking Management** – A review of best practice for parking management strategies was done to analysis and create recommendations for the following:
 - Residential On-Street Parking
 - Overflow Residential Parking
 - Private Property Parking Enforcement

NEXT STEPS

- The City is looking for feedback about the proposed new parking standards prior to going to committee
- Intensification Area parking standards will be reviewed and incorporated into the Mobility Hub planning review process.

HHHBA STAFF POSITION

After the review of the staff report and the IBI "Burlington City-wide Parking Standards Review" report HHHBA comments are as follow:

- **The parking stall width within a structure of standard should be re-evaluated.** The justification to retain the existing parking stall width within a structure standard is unclear. When compared to best practice (specific peer review) all widths within a structure elsewhere are the same as the respective standard parking stall widths, except for Oakville, where their width in a structure is larger than the standard parking stall width. There is no reason for a larger stall width within a structure especially with the provision of "0.3m additional width for each obstruction" being implemented. HHHBA suggests that this standard be re-evaluated and recommend using the same width as a standard parking stall width of 2.75m.
- **The parallel parking stall length standard should be re-evaluated.** The recommended stall length for parallel parking is too large, without justification when compared to comparable standards elsewhere. Therefore; we recommend that the parallel parking stall length standard proposed should be reduced to keep with the best practice results.
- **Alternative stall dimensions for small cars should be considered.** Although not discussed within the staff report or the IBI report we suggest the investigation into alternative dimensions for smaller cars, especially for underground parking structures. By introducing this provision it will help to reduce the surface area required for parking while providing labeled areas that are specifically set out for smaller cars.
- **The drive aisle width standard should be re-evaluated.** There is currently no drive aisle width standard provided in the City's by-laws, therefore; we support setting a standard for this. By introducing drive aisle widths it will allow for ideal manoeuvring space and provide adequate means of ingress and egress from a parking space into the aisle.

Although this report recommends adopting the recommended drive aisle width of 6.0m from the Site Plan Application Guidelines, HHHBA suggests that further studies be done to consider a minimum drive aisle width for one- and two-way traffic and the consideration of a variety of parking angle degrees. By introducing this new aspect of drive aisles it will allow for site plans to provide more creative and efficient parking layouts.

- **Further clarification is required for the proposed barrier-free parking standard.** We agree with adopting the AODA accessible parking design guidelines, although we recommend clearly



Burlington City-Wide Parking Standards POSITION PAPER

outlining the minimum parking stall length to avoid any confusion when siting in barrier-free parking spaces on a site plan.

- **Ensuring the availability of a proper public transit system.** We agree that the new type of development that the City of Burlington will be experiencing in the near future (intensification and infill development) will provide more compact, connected and walkable communities with the hopes that reliance on personal automobiles will decrease. It will be imperative that the City of Burlington develops proper public transit systems that work efficiently enough to encourage people to use it, instead of cars. Ridership friendly options that provide more frequent transit to Mobility Hubs and high demand city-wide destinations will ensure the vibrancy of multi-modal transportation in the City of Burlington.
- **New land use specific parking rates are encouraging to see, but more can be done when considering parking requirements in areas with alternate modes of transportation.** Many applicants are required to complete parking studies as requested through the OPA/ZBA/SPA processes. These studies which consider items such as bicycle racks, car sharing options, at times recommend that parking in areas with alternate modes of transportation can be reduced or altered versus that outlined in this document. The recommendations from these required parking studies that may differ from standards for specific reasons should be considered when moving forward with decisions on applications.

Burlington 
SENIORS'
Advisory Committee

Kaylan Edgcumbe
Manager of Transportation Planning and Parking
City of Burlington

June 28, 2018

Dear Ms. Edgcumbe:

Re: City of Burlington, City-wide Parking Standards Review

Burlington is one of the fastest growing older communities in Ontario and four of the premises of the **Burlington Active Aging Plan** include:

- Assessment of gaps and opportunities to make Burlington more age friendly
- Hearing recommendations in regards to older adults that are within municipal jurisdiction
- Improve mobility through the city
- Increase opportunities for social participation

Therefore, the Burlington Seniors' Advisory Committee makes the following recommendations regarding the City of Burlington, City-wide Parking Standards Review:

- 1) Specific recommendation on combining or joint partnership with Burlington City Transportation and Transit and the committee for the City-wide Parking Review. For example, how these two entities would work together to provide a safe and reliable public transportation system with known schedules providing transportation for seniors east/west and north/south in Burlington so there is a decreased need on family automobile use and parking within the City.
- 2) Recommendation and specifics on how the City promotes, supports and educates a cultural change to reduce use and dependency of family automobile usage within the City. For example, how are you going to support and what are the timelines for less auto dependency and in what specific areas that will have viable alternatives.
- 3) Recommendation and specific ways the City will support the standards in AODA guidelines, noting percentage of accessible parking designated spaces as compared to other parking spaces in given area and where these accessible parking spaces are located.

Respectfully submitted,

Sheila Burton, Chair, Advocacy Sub-Committee
Burlington Seniors' Advisory Committee