



Performance Audit

City of Pittsburgh

RESIDENTIAL PARKING PERMIT PROGRAM

Department of City Planning
Pittsburgh Parking Authority

Report by the
Office of City Controller

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MICHAEL E. LAMB

CITY CONTROLLER

First Floor City-County Building • 414 Grant Street • Pittsburgh, Pennsylvania 15219

September 1, 2016

To the Honorables: Mayor William Peduto and
Members of Pittsburgh City Council:

The Office of City Controller is pleased to present this performance audit of the *Residential Parking Permit Program* conducted pursuant to the Controller's powers under Section 404(c) of the Pittsburgh Home Rule Charter.

EXECUTIVE SUMMARY

The Residential Parking Permit Program (RPPP) of the City of Pittsburgh began in 1981 in an effort to provide relief to residents whose neighborhoods were being impacted by the location of public and private facilities and institutions. The major complaint from residents was that they felt that they were being forced to park an unacceptably far distance from their homes due to parking congestion caused by neighboring institutions.

The Program was designed to provide residents the first chance to claim the limited parking spaces on public streets to the partial exclusion of non-resident vehicles in selected congested neighborhoods. The program is jointly operated by the City of Pittsburgh Department of City Planning (DCP) and the Pittsburgh Parking Authority (PPA). The City Code Chapter 549 outlines the responsibilities of the Department of City Planning in the implementation of Residential Parking Permit areas.

The responsibilities of the DCP include the assessment of residential desire for the program and the assessment of the extent to which non-resident parking is a problem. The PPA is responsible for the enforcement of the area once it is designated, the administration of the program and the sales of the permits and passes.

The program does not guarantee a parking space for any resident or grant permit holders dispensation from City parking laws.

There is no limit to the amount of permits a resident may individually purchase; however, unrelated household members may purchase no more than three per address. Currently, visitor passes are restricted to one per household.

Findings and Recommendations

The Residential Parking Permit Program

The City began its Residential Permit Parking Program in the area around the site of the old St. Francis Hospital along Penn Avenue in Lawrenceville. Originally, RPPP zones gravitated toward neighborhoods with large employers, such as hospitals or universities. The program was then expanded in response to non-residents coming into neighborhoods and using the on-street parking as commuter “park and rides”. A more recent issue is the congestion often caused by the City’s nighttime economy such as bars, hospitality venues, and stadiums/arenas etc.

Established RPPP Areas

There are now 38 established RPPP zones in the City, designated by letters A to LL. The letter A is the oldest area. After the program reached letter Z, designations returned to ‘A’ but were doubled; e.g. AA, BB, etc. It is important to note that permit areas oftentimes overlap neighborhood boundaries

Finding: The East End of Pittsburgh contains the majority of the RPPP areas.

Parking Spaces Inventory and Permit Issuance

Currently, the number of available public street spaces in an area is estimated every 4 years by the Department of City Planning during each area’s recertification process. There seems to be approximately 15,025 parking spaces in RPPP areas. In Pittsburgh, there were 17,907 active permits held in 2014-2015 for 37 designated RPPP areas

Finding: The City of Pittsburgh issues more permits than available on street parking spaces.

Finding: Twenty (20) districts have more permits issued than street spaces available, with eight of the nine largest districts (those with 750 or more permits issued) in this category.

Recommendation: A complete inventory of spaces that accurately captures all the available parking would be useful in creating a parking plan that recognizes commercial and tenant parking availability more fully. The parking space inventory should include all categories of available spaces for planning purposes. Recently, DCP personnel have started to include these figures in their reports.

Department of City Planning Duties

The Department of City Planning is the agency that processes the requests for RPPP areas. It also recertifies the need for continued RPPP status every 4 years.

Designation of an RPPP Neighborhood

To be eligible, a RPPP area must be impacted by non-resident vehicles for extended periods of time during the day or night, on weekends or during holidays, and each newly created residential parking permit district must guarantee selling at least fifty (50) permits per City Code Section 549.04 (a).

Finding: Currently, seven (7) of the 37 areas use fewer than 100 permits, and two (2) of these areas support fewer than 50 permits. This is because it was not until 2008 that the Pittsburgh City Code was amended to set a minimum number of permits to be sold per permit area.

Certification Process

The RPPP certification process begins with a minimum of twenty (20) requests from residents of a neighborhood. A meeting is then held to discuss the parking situation and distribute petitions. This resident-driven initiative has little initial input from business/commercial/institutional entities within the district.

The signatures of at least seventy percent (70%) of residents in the area will trigger a parking study to determine eligibility for residential permit parking.

Within thirty days the City Planning Commission (CPC) is presented with the study during a public meeting without public input. The Commission will make comments at this time. Following the initial briefing, the plan is voted on after a final presentation to CPC and then the public is invited to provide input. If the plan is accepted, boundaries of the residential parking area, the days of operation and time limitations must then be set by the area's residents.

After the plan is approved by the Commission, it must also be approved by City Council. The parking district becomes active after these approvals and after it is physically designated by signage provided by the City's Department of Public Works (DPW).

Finding: The lag time between City Council's approval of a RPPP district and the area's signage posting has been estimated to be up to six months.

The RPPP area cannot be enforced until the borders and hours are posted. The lag time is less during the winter and longer during the summer, correlating with the workload of the DPW Paint Shop. This is an unfair position to put residents in, as it asks them to buy permits without benefitting from enforcement.

Finding: Residents are able and encouraged to purchase permits at the time of the permit area approval, however enforcement is not active until after signs are posted in the area.

Recommendation: The RPPP Administrator should work closely with DPW to post a newly approved RPPP area within 30 days of approval. For example, DCP could notify DPW when City Planning Commission approval has been granted so DPW has ample time to schedule the job once the area is approved.

Parking Impacters

According to the RPPP designation/recertification reports, four major impacters on residential parking congestion were identified: colleges/hospitals (23 or 60.5%), commuter parking for transit connections (17 or 44.7%), business/commercial (11 or 28.9%), and stadiums/arenas (3 or 7.9%).

Commuter Parking

Finding: Commuters will park in residential neighborhoods in order to take public transportation at a more convenient access point. The creation of public transit routes creates parking issues for affected neighborhoods.

Recommendation: DCP should remain proactive with any upcoming projects initiated by outside agencies and provide input with respect to residential parking concerns.

Business Parking

Finding: Commercial/retail concerns are not fully considered in the earliest stages of RPPP determination because of the residential-driven nature of the process. Commercial entities are sent a questionnaire and informed of the community meeting after the residential petitions have been signed and verified.

Finding: Customer parking is sometimes an issue, but with one or two hour grace periods for on-street parking and metered parking available in most business districts, it is not as pressing a matter as employee parking for commercial entities.

Recommendation: DCP should recognize that there is a symbiotic relationship between residents and businesses. Residents need business and business need residents. Inclusion of both parties in all stages of an areas development is important and beneficial to both and should be a priority.

Tenant Parking

Another impacter, although not designated as such by the DCP, is tenant parking. City Code provides that each rental unit be considered a household and be allowed three residential permits.

Finding: The areas with the highest concentration of multi-unit apartment buildings with residents holding more than ten permits per street address are West Oakland/Bellefield, Oakland and the Shadyside communities.

Finding: City Code does not address those apartments that provide their tenants with off-street parking, nor does DCP include off-street parking in its district design.

Recommendation: Apartment tenants with dedicated off-street parking included as part of their lease may not need three residential parking permits per unit, and restricting the amount of permits allotted to these individuals should be examined. Tenants located in RPPP areas should in all cases have access to visitor and specialty permits.

Nighttime Hospitality Parking

Areas that support a nighttime hospitality economy (bars, restaurants, theatres, etc.) are often the most contentious, as residents find their parking spots in demand even after the traditional work hours have concluded. Residents are often squeezed out of spaces until after the hospitality venues close.

Recommendation: DCP should recommend a change in the Zoning Code so that new business parking requirements are based on occupancy rather than square footage. By looking at the impact to parking in terms of occupancy, the effect on residential parking can be anticipated and solutions considered in advance.

Finding: In the latest area soon to be established (Area KK, South Side), the surveys occurred between 10:30 am and 1:30 pm. While they verified that the area qualified for RPPP inclusion during the daylight hours, it did not examine the nighttime parking issues in that neighborhood.

Recommendation: In neighborhoods impacted by nighttime activities, the parking survey should include an evening activity report or a report during a sports game or concert so that the decisions about alternate parking and the hours of enforcement can be based on empirical evidence.

Stadia/Arenas

Finding: City Planning does not conduct surveys during the nighttime or during weekend events that are causing the most acute parking problems.

Recommendation: The DCP certification and recertification reports should incorporate event information gathered during event hours in areas impacted by sporting and concert venues. This would include an event parking survey and the necessity of Parking Authority enforcement during events.

Stadia Enforcement

Finding: Parking enforcement around Stadia areas yields less tickets than other RPPP areas. This could be because enforcement hours do not always overlap with the events that cause the parking problems.

Recommendation: DCP should consider rewording signage for the Stadia/Arena areas to not only include days and times of enforcement but to say that this RPPP area is also enforced during all event times. This generic language will allow enforcement on an as needed basis when parking pressure is at its highest. The Parking Authority will also need to keep an event schedule on hand to ensure that enforcement happens during events in these RPPP areas.

Flexible Parking Design and Alternative Transit Options

Communities have become more mixed use with residential, rental, retail, commercial, hospitality, and institutional uses all impacting parking. Conversations with local district representatives indicate frustration with the one-size-fits-all approach of City Code regarding Residential Parking areas.

Recommendation: With the diversity of impacters, some of which combine in certain districts. DCP should ask City Council to consider creating language to make Chapter 549 a more flexible tool.

Recommendation: All alternatives should be considered when designing a RPPP area. The program objective should be to find a holistic approach to reducing street congestion, incorporating the needs of the integrated community rather than solely focus on residential parking.

Recertification Process of RPPP Areas

Finding: The percentage of questionnaires returned during the recertification process in 2013 - 2014 was, on average, 15.1% of the permit holders. The survey represents the residents' concerns and satisfaction rating, but the return rate is quite low.

Recommendation: A larger representation of residents' opinions should be sought when recertifications are due. City Planning should devise a method that will generate greater residential participation in the recertification process. It should join forces with the PPA to require a completed residential questionnaire as part of the permit renewal process during recertification years, perhaps phased in as the permit process transitions online in the future.

Recertification Surveys Results

Finding: The majority of the survey respondents found the RPPP designation to be acceptable to varying degrees, with the most dissatisfaction being registered over enforcement issues.

Finding: The recertification reports included all the information required by City Code, but was not consistent in presenting the survey results from the permit holders. Having a standardized recertification report would help Council and the public better understand the survey results.

Finding: The designation/recertification reports other than for 2013 were not posted on DCP's website although they were available in electronic format to the auditors.

Recommendation: The Residential Parking Administrator should prepare a "boilerplate" report format to provide consistency in presenting recertification survey results. The most recent designation or recertification reports for all RPPP areas should also be available on the web for public viewing.

Decertification Process of RPPP Areas

There is no defined City process that allows for the decertification of a RPPP area between recertification years. The only decertification of a RPPP area in the program's history was made at the residents' request for Area I, and it was reestablished two years later when St. Francis Hospital was replaced by Children's Hospital. City Planning accepted a petition signed by 70% of the Area I residents to decertify while between recertification cycles, which appears to be a reasonable procedure as the City Code is silent.

Finding: City Planning accepted a decertification petition by using a process that copied the designation process. With no decertification process written in the City Code, RPPP administrators proposed an amendment to the City Code for City Council consideration.

The proposed amendment reads “A residential parking permit area shall be deemed eligible for removal and termination of the Residential Parking Permit Program if, based on the petitions prescribed by the Parking Permit Officer, seventy (70) percent of the households in that residential parking area petition in favor of removal from the program. On verification of the signed petition, the Parking Permit Officer will recommend to City Council the removal of the residential parking program in that area or block. Once the removal is legislatively made effective, the designated block or area must wait two (2) years before being considered for permit parking again”.

Finding: Recertification reports are tasked to verify that the RPPP areas not only remain supported by the residents, but are still negatively impacted by non-residential parking.

Recommendation: This proposed amendment should be considered by City Council to provide a defined decertification process in Chapter 549 and if the parking impacter is no longer present at recertification, DCP should recommend removal from the RPPP unless there are mitigating circumstances.

Pittsburgh Parking Authority

RPPP revenue and costs for 2013 and 2014 were:

2013: \$364,324 revenues - \$402,210 costs = (\$37,686)

2014: \$377,062 revenues - \$402,652 costs = (\$25,590)

Finding: In 2013 and 2014 the RPPP operated at a loss however, RPPP fine revenue covers any operating costs not paid for from program permits and pass fees.

The remaining ticket revenue is deposited into the City’s General Fund.

Permit Activity

The permit and pass registration and upkeep of each RPPP district is performed by two part-time employees, who also process mail-in paperwork and answer walk-up and phone inquiries. The actual workload is spread throughout the year as different RPPP districts have different start dates for their permit years. Every month there are three or four districts that become due for annual registration.

Finding: The staggered permit years for districts allows for a more evenly distributed workload, which allows the staff time to process the work and provides more timely service for the permit holders.

Finding: The transactions processed by the RPPP staff increased from 30,218 permits and passes handled in 2013, to 33,230 handled in 2014, an increase of 9.9%. (The totals are slightly different from the 2014-15 permit totals because of overlap between the fiscal year and the sales year.) Now with the certification of the KK area, the permit load will continue to increase.

Finding: Two part-time staff are responsible for the day to day operations of the RPPP office which, in 2014, brought in \$377,062 in revenue.

Recommendation: The Parking Authority should consider making the RPPP customer service staff positions full-time with benefits due to the specialized knowledge required of the staff and the consistent and growing annual workload. Additional revenue, with the KK parking area permits being sold and ticket revenue, will be coming in so the increase in personnel costs would not be a financial burden to the organization.

Online Registration

As noted in the City Controllers' PPA 2013 audit and as is still the case, the PPA does not offer online registration and renewals as done in several other cities. The Parking Authority has begun the process of switching to paperless registration pending budget considerations, including plans for a staffed help desk for those who do not have internet access.

Finding: PPA does not offer online registration for RPPP users.

Recommendation: The PPA should offer online RPPP permit registration, renewals, replacements, and passes while continuing to offer mail, phone, and walk-in options for those without internet access. Online RPPP permit registration would increase the efficiency of the RPPP staff and add convenience to the consumer.

Registration Procedure

The registration procedure for a residential parking permit requires the individual to visit the RPPP office downtown or download a form available online, then make copies of the required paperwork and mail everything to the office. Other cities run a background check on whether the vehicle has any outstanding parking violations in the cities' database before granting a permit. Allowances are made for citations currently being appealed.

Finding: The PPA administers a website where an individual can look up and pay any outstanding parking citations.

Recommendation: The PPA should determine that no vehicle is registered in the RPPP if it has an outstanding City parking violation. The authority to perform a background check and to deny a permit because of outstanding citations should be proposed as an amendment to City Code Chapter 549. The PPA website is already configured to accept citation payments and lookup citations via license plate number.

Permits and Passes

Of 17,907 permits examined that were issued between September of 2014 and August of 2015, 48 permit holders were found to possess 4 or more permits. This is less than 1% of the households. Of those 48 households, 36 were residential, 9 were apartment house addresses and 3 were home-based businesses. Only 4 of the addresses had more than 5 vehicles registered.

Finding: The RPPP does not appear to have a problem of households hoarding passes.

Vehicle Weight

Finding: Vehicle weights, the primary factor in determining if a vehicle is eligible for RPPP registration, have increased in the past twenty-four years and in that time, average personal vehicle size has increased for many models.

Recommendation: The weight of a vehicle for RPPP inclusion without additional verification should be increased to 7,500 pounds in City Code Section 549.02.

Residential Parking Permit Fees

Finding: Pittsburgh's annual \$20 residential parking fee falls within the range the \$20-25 median fee of other selected Eastern cities. It has been unchanged since 1991. The Authority operates the RPPP at a deficit.

Recommendation: The PPA should consider petitioning City Council to increase the Residential Permit fee from \$20 to \$25.

Prorated Permits

Although City Code Section 549.13(a) calls for a prorated charge of \$10 for registration of six months or less, the annual \$20 fee is the cost charged to registrants regardless of

registration date by the PPA to capture administrative costs which remain fixed. The great majority of registration payments are made at the beginning of the program year, so this prorated rate is of limited impact. The PPA has an amendment to the City Code prepared to send to City Council to rectify this situation.

Finding: The fees charged for Residential Parking Permits of six months or less do not match those called for in the City Code.

Recommendation: Residential parking permit fees should be established at one rate, as the fee is used to cover administrative costs, which are the same no matter the length of time of the permit.

Replacement Parking Permits

The need for a replacement parking permit occasionally arises. If a new vehicle is purchased and the old permit is scraped off the window and presented to the RPPP office along with your new car registration, the replacement permit is free. If the old permit is not removed and the license plate is the same, the replacement permit is \$5. If the license plate has changed, the permit holder must submit a notarized letter stating that the permit sticker was not removed and the plate has changed. The replacement fee in this instance is also \$5. All of the above circumstances also need the new vehicle registration completed and attached.

Finding: The PPA collects a great deal of information during its registration of permit holders. However, it does not compile a breakdown of household statuses, be they homeowners, tenants or students.

Recommendation: The Parking Authority RPPP staff should collect a permit holder's residential and student/non-student status for analytical and program management purposes.

Visitor's Passes

The PPA can issue one visitor parking pass per household/business of a residential parking permit area, whether or not the resident is a permit holder. A visitor's pass can be purchased at the same time as the resident's permit, or as needed. The fee for a visitor's pass is \$1. In 2014, the Parking Authority sold 14,755 visitor passes, an increase of 19% from the 2013 sales of 12,378 visitor passes.

Finding: The majority of cities surveyed issued visitor passes for varying time frames, so there is no consensus on time limitations. All offered the visitor passes for no or nominal cost.

Finding: The recertification reports of 2013-2014 determined that the average number of registered visitor vehicles parked in an area makes up approximately 12% of the total permitted parked vehicles, so non-residential visitors, generally, do not cause parking congestion.

Recommendation: City Council should consider amending the City Code to allow for the issuance of visitor passes that are available for different lengths of time and could be sold via a tiered pricing structure as per the Parking Authority's recommendation.

Finding: The PPA is investing in a license reading technology to streamline the parking enforcement process.

Recommendation: The PPA should continue to upgrade its administrative and enforcement tools with available technology and transition from a paper-based permit system. It should select a platform that can share information with both the Public Safety Department and DCP.

Finding: A single visitor's pass can be sold to any resident of a RPPP area, even if they do not hold a residential parking pass themselves. In the past year, there were slightly over a thousand visitor passes issued to residents who did not have a permit, generally because the resident does not own a personal vehicle.

Recommendation: The RPP should consider slightly raising the cost of visitor passes sold to people who don't have a residential permit. This is because these types of visitor passes take longer to process than a visitor's pass of someone who already has a parking permit.

Temporary Passes

Currently the RPPP does not offer any type of temporary pass for anyone who is making a permanent move to Pittsburgh. Drivers with out-of-state license plates are given a regular parking permit.

Temporary passes serve as a transitional parking permit for new residents who come from out-of-state and need time to register their vehicles. According to Pennsylvania state law, all new residents are required to make application for Pennsylvania title and registration of their vehicle(s) within 20 days of establishing residency in Pennsylvania. A temporary pass, sold for a limited amount of time, would aid new residents in making the transition to their new homes.

Finding: Without a temporary pass permit, when the PPA switches to the license plate reader technology out of state permit holders who change car title and plates to establish residency in Pennsylvania will be ticketed.

Recommendation: The RPPP should consider offering 45-day temporary passes for residents who just moved into Pittsburgh from out of state, after which time they either meet the qualifications to switch to a full residential permit or be terminated from the RPPP for failing to meet PA State law.

Employer/Employee Permits

Commercial activity is a major impacter in several neighborhoods. City Code Section 549.07 (b) (2) limits commercial property owners/lessors to one parking permit.

Recommendation: Increasing the limit of business permits should be considered for smaller neighborhood businesses if the number of available spaces allows for it. Businesses with larger staffs should make arrangements for off-street parking or alternate employee transit.

Commercial Contractor Permits

Several cities offer City-wide parking permits for contractors. Pittsburgh does not offer this category of permit, and as a result, workers servicing a home in an RPPP area can be ticketed.

Finding: Contractors working during the day in an RPPP area have no legal means to park beyond the grace period and can be ticketed for a parking violation while performing a household service.

Recommendation: The City Code should be changed to allow for annual City-wide contractor permits for company-registered, marked service vehicles to park in RPPP areas. The business qualifications and a reasonable fee should be determined by the DCP and the PPA.

Family/Volunteer Caretaker Permits

Some cities provide special permits for unpaid family home care situations, such as eldercare and childcare, which are usually performed by family members or volunteers. The RPPP staff is currently proposing an amendment to Chapter 549 to allow for the issuance of Medical Parking Permits for caretakers.

Finding: The United State Census suggests that there will be a need for elder and child care in Pittsburgh.

Recommendation: An amendment to City Code Chapter 549 should be made to designate a RPPP permit category for volunteer or family eldercare and childcare. The proposed permits should be area-specific rather than City-wide, and as such, should be priced approximately the same as a residential permit, with qualifications and verification standards determined by the Department of City Planning.

Visiting Professional Medical Permits

Medical parking permits are not currently issued, but would provide an annual City-wide RPPP permit for professional health caregivers who visit residents of a RPPP area on a regular basis for extended visitation periods beyond the usual grace period of one or two hours.

Recommendation: An amendment to City Code Chapter 549 should be made to designate a RPPP permit category for commercial home healthcare agencies. The proposed permits should be City-wide, and as such, should be priced accordingly with qualifications and verification standards determined by the Department of City Planning.

Enforcement & Ticketing

Finding: The PPA is transitioning from hand-held devices to the much more efficient plate recognition readers, which can be carried personally by the PEO or mounted on a vehicle, as it is now for booting enforcement.

Finding: The numbers of tickets issued were proportional to the amount of permits in an area, indicating that the general geographic enforcement by the PEOs was equivalent across the City.

Finding: The City-wide ratio of tickets issued to permits issued is 1.75 (28,360 tickets/16,213 permits). The regional ratios were 1.79 for the East, 1.55 in the South and 1.73 for the North.

Finding: Enforcement of all RPPP areas is roughly proportional to the number of permits issued in the area.

Finding: More tickets are issued in the RPPP areas of Oakland, Bloomfield, Lawrenceville, Shadyside and Uptown.


General Enforcement Issues

Currently, the PPA enforcement division has 35 Parking Enforcement Officers (PEOs) on duty, with only 17 being full-time employees. Even with upcoming technological improvements in their enforcement tools, the limited manpower makes enforcement of RPPP districts less of a priority than patrolling high-traffic corridors.

Finding: Due to manpower limitations, the PPA does not patrol all RPPP areas on a routine basis, often responding reactively to resident complaints rather than on a proactive basis.

Recommendation: While the Parking Authority's PEO roster is necessarily based on budgetary considerations, in lieu of increasing the PEO force, it could consider operating RPPP neighborhood "sweeps" where staff is committed to one neighborhood over a brief period of days to enforce Residential Parking regulations.

Sincerely,

A handwritten signature in blue ink that reads "Michael E. Lamb". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael E. Lamb
City Controller

INTRODUCTION

This performance audit of the Residential Parking Permit Program was conducted pursuant to the Controller's powers under Section 404(c) of the Pittsburgh Home Rule Charter. This is the third audit of the Residential Parking Permit Program, as it was part of the City Controller's Parking Authority audit of 2012 and had its own audit in 1989.

This audit assesses the following: efficacy of the current guidelines for creating, amending, or ending a Residential Parking Permit Program area, examination of the systems employed to process permits and enforce permit areas, an overview of proposed changes to the current Residential Parking Permit Program system, and compliance with previous audit suggestions.

OVERVIEW

The Residential Parking Permit Program of the City of Pittsburgh began in 1981 in an effort to provide relief to residents whose neighborhoods were being impacted by the location of public and private facilities and institutions. The major complaint from residents was that they felt that they were being forced to park an unacceptably far distance from their homes due to parking congestion caused by neighboring institutions. The heavy use of residential streets by non-residents seeking parking for adjacent facilities also contributes to pollution, litter, traffic congestion, and accidents.

The Residential Parking Permit Program was designed to provide residents the first chance to claim the limited parking spaces on public streets to the partial exclusion of non-resident vehicles in selected congested neighborhoods.

The Residential Parking Permit Program of the City of Pittsburgh is jointly operated by the City of Pittsburgh Department of City Planning and the Pittsburgh Parking Authority. The City Code Chapter 549 outlines the responsibilities of the Department of City Planning in the implementation of Residential Parking Permit areas.

OBJECTIVES

1. To examine the processes by which a Residential Parking Permit Program area is requested, designated, amended, recertified, or terminated.
2. To examine the procedures employed to issue permits and enforce permit areas.
3. To examine the current permit categories and their possible expansion.
4. To compare practices of Pittsburgh's Residential Parking Permit Program with those of other cities.
5. To determine legal compliance with City Code.
6. To make recommendations for improvements.

SCOPE

The scope of the Residential Parking Permit Program audit examined program activities and processes from January 2013 to August 2015.

METHODOLOGY

The auditors interviewed the Department of City Planning's Director, Assistant Director of Strategic Planning, and the Residential Parking Permit Program administrator. Also interviewed were the Pittsburgh Parking Authority's Director of Enforcement and staff members. The auditors met with City Council members from the East End, North Side and South Side who represent districts that encompass commercial, tenant, commuter, nighttime hospitality venues, e.g., theaters and bars, institutional and major venue parking impacters.

The auditors attended the introductory and following Public Hearing before the City Planning Commission for proposed permit area "KK" (South Side Flats between South 16th and South 25th Streets).

Samples of twenty other cities' Residential Parking Permit Programs were examined via the Internet. Information collected included the costs of residential parking permits and visitor passes, methods of applying for and renewing permits, specialized permits, certification and recertification information, and, where available, number of permits sold vs. actual spaces available.

A spreadsheet was compiled showing each area with its initiation date, recertification dates, days and hours enforced, location of permit area, and primary impacter for the area.

Information received from City Planning included copies of forms used for the initiation of the permit areas, recertification reports, and a proposed permit area report. Also received were proposed amendments to City Code Chapter 549 entitled "Residential Parking Permit Program" suggested by City Planning and the Pittsburgh Parking Authority. The City Code as currently written was examined to determine legal compliance with Residential Parking Permit Program regulations.

The Parking Authority provided information regarding the number of permits/passes sold, various demographic data and enforcement/ticketing issues. Also provided was fiscal information regarding the revenues collected by the Residential Parking Permit Program.

FINDINGS AND RECOMMENDATIONS

The Residential Parking Permit Program

Purpose

The Residential Parking Permit Program (RPPP) was instituted to give City residents in congested areas a better chance to park near their homes. Generally, areas around major institutions (hospitals, universities, etc.), transit lines, and business/commercial districts are most impacted. There are various criteria that must be met in order to qualify for a permit area.

Qualification for inclusion into the RPPP is determined by the Department of City Planning (DCP) in accordance with City Code Chapter 549 while enforcement is provided by the Pittsburgh Parking Authority (PPA).

Legal Basis

The legal basis for the Residential Parking Permit Program is “City Code Title 5, Chapter § 549 - Residential Parking Permit Program,” enacted as Ordinance 30-1981, effective date 9-22-81, as amended. The Chapter includes sections regarding the Designation Criteria, Process & Approval, Fees, Resident’s Permits, Visitor’s Passes, Violations, Revocations and Renewals and other matters pertaining to the RPPP.

History

The City began its Residential Permit Parking Program in 1981 in the area around the site of the old St. Francis Hospital along Penn Avenue in Lawrenceville. Originally, RPPP zones gravitated toward neighborhoods with large employers, such as hospitals or universities. The program was then expanded in response to non-residents coming into neighborhoods and using the on-street parking as commuter “park and rides”. A more recent issue is the congestion often caused by the City’s nighttime economy. Bars, hospitality venues, and stadiums/arenas often cause nighttime parking problems in places such as the Central Business District, South Side, Bloomfield, North Side and other neighborhoods with concentrated businesses and entertainment entities.

The main purpose of the RPPP is to keep commuters and other visiting drivers from parking on residential streets for a long period of time and thus preventing residents from finding a parking space close to their homes. The program does not guarantee a parking space for any resident or grant permit holders dispensation from City parking laws.

Summary of the Residential Permit Parking Program

The RPPP is a joint effort between the DCP and the PPA. The responsibilities of the DCP include the assessment of residential desire for the program and the assessment of the extent to which non-resident parking is a problem. The PPA is responsible for the enforcement of the area once it is designated, the administration of the program and the sales of the permits and passes.

A resident in an RPPP area must provide proof of vehicle registration and proof of residence within the RPPP zone. There is no limit to the amount of permits a resident may individually purchase; however, unrelated household members may purchase no more than three per address. Currently, visitor passes are restricted to one per household.

Established RPPP Areas

There are now 38 established RPPP zones in the City, designated by letters A to LL. The letter identification is sequential from the date an area was requested by its residents; A is the oldest area. After the program reached letter Z areas designations returned to 'A' but were doubled; e.g. AA, BB, etc. As of this writing, area KK is in the final stages of the designation process and should be operational soon.

It is important to note that permit areas oftentimes overlap neighborhood boundaries. However, the majority of the current RPPP areas are located in the East End. The communities of Lawrenceville, Bloomfield, Friendship, Homewood, and Garfield host 9 RPPP areas and the neighborhoods of Shadyside, Squirrel Hill, and Point Breeze have 8 designated districts. Oakland is the single most impacted neighborhood, with 7 RPPP areas within its borders that cover nearly the entire 4th ward below Forbes Avenue with 2 more areas in nearby Schenley Farms. The South Side and the South Hills have 6 areas, most lying in the South Side Flats, but also in Beechview and Mount Washington. The North Side has 4 areas with 2 more in the Hill District.

Finding: The East End of Pittsburgh contains the majority of the RPPP areas.

According to the US Census Bureau, there are 133,005 households in the City of Pittsburgh (2009-2013 average), with 11,525 unique households holding residential parking permits. The RPPP zones impact roughly 8 percent of Pittsburgh residents.

Table 1 lists the parking permit areas, corresponding neighborhood and the number of permits active for the sample time period of August 2014 through August 2015. There were 17,907 parking permits issued during this time period.

TABLE 1

RPPP Areas & Residential Permits August 2014 - August 2015					
Area	Neighborhood	Permits	Area	Neighborhood	Permits
A	Lawrenceville	1,156	T	Beechview	252
B	Oakland	433	U	Shadyside	1,711
C	West Oakland/Hill	139	V	Shadyside	131
D	Oakland	2,172	W	Crawford-Roberts	112
E	South Oakland	247	X	Shadyside	250
F	East Allegheny	583	Y	Shadyside	385
G	Allegheny West	424	Z	Squirrel Hill	274
H	Bloomfield/Friendship	1,785	AA	Beechview/Squirrel Hill	20
I	Garfield	45	BB	Bloomfield/Friendship	822
J	East Oakland/Shadyside	676	CC	South Side	1,018
K	Squirrel Hill	277	DD	South Side	931
L	North Side	108	EE	Point Breeze	215
M	South Oakland	448	FF	Schenley Farms	76
N	Mount Washington	232	GG	Lawrenceville	280
O	Homewood	56	HH	Mexican War Streets	252
P	Bluff	193	II	South Side Flats	757
Q	North Oakland	64	JJ	Bloomfield	583
R	Bloomfield/Lawrenceville	665	KK	South Side	n/a
S	Schenley Heights	81	LL	Bloomfield/Oakland	54
Total = 17,907 Parking Permits					

Source: Pittsburgh Parking Authority

Parking Spaces Inventory and Permit Issuance

Currently, the number of available public street spaces in an area is estimated every 4 years by the Department of City Planning during each area’s RPPP recertification process. Sometimes the estimates of the number of available public street parking spaces are included in the recertification process paperwork and sometimes it is not. The auditors used these parking space estimations in the recertification reports for the number of available parking spaces in each RPPP area. Whenever a report was not available, the auditors referenced maps and estimated spaces on their own. Between both estimates there seems to be approximately 15,025 parking spaces in RPPP areas.

In Pittsburgh, there were 17,907 active permits held in 2014-2015 for 37 designated RPPP areas (no permits for Area KK have been issued as of the audit’s writing). Of the 17,907 residential parking permits issued, 16,319 were valid for the entire year and 1,588 were valid part of the year. Permits that were valid for part of the year are usually for residents who move in or out of the district during the middle of the permit year. These partial permits represent 9.3% of the permits issued for 2014-2015 and are mostly in student-dominated neighborhoods like Oakland, where parking availability fluctuates with the academic year.

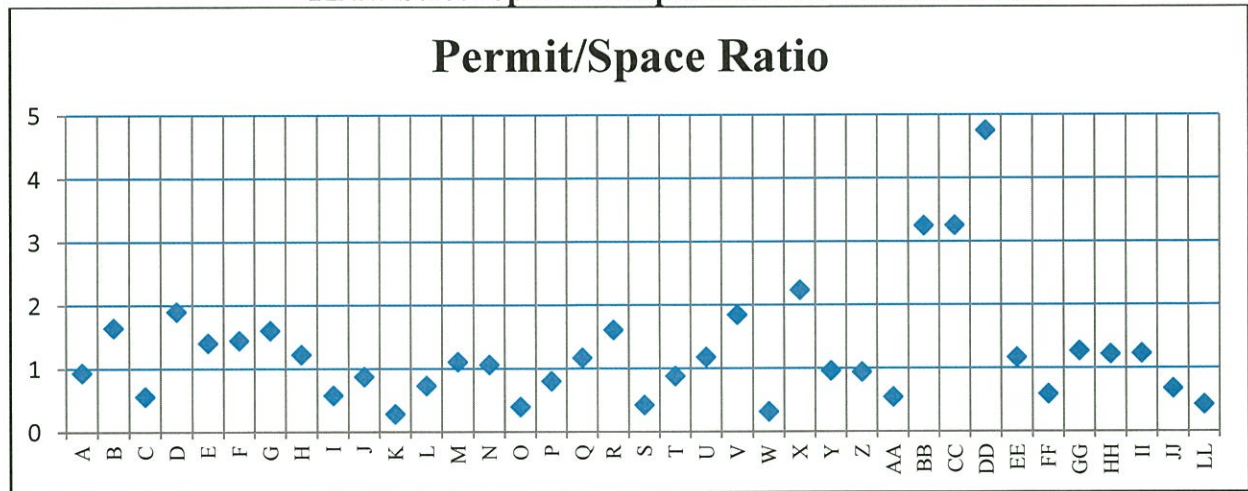
On average, the available street parking spaces in a RPPP district can accommodate only 83.9% of the permitted vehicles. This issue is not unique to Pittsburgh. A 2002 report of the *Legislative Analyst* found that in 2001, there were 3 percent more residential parking permits issued than there were curbside spaces within the designated residential parking permit zones in San Francisco.

Finding: The City of Pittsburgh issues more permits than available on street parking spaces.

Other parking space availability such as off-street (driveways, pads and tenant/employee parking lots), metered and paid parking lot spaces are not included in the count of available spaces. For example, the PPA operates two garages and several surface lots in RPPP districts that provide 1,143 additional spaces available for non-residential use. The space count does not include the number of metered spaces nor business and residential off-street garages/pads that are available. Many rental units provide parking for their tenants to some degree. These spaces as well as spaces provided by private lots are not included in the RPPP count.

Chart 1 shows the number of permits issued in 2014 to the number of available parking spaces. The chart shows that in RPPP area A, there is almost 1 parking space for every permit issued. In RPPP area B there are 1.66 parking spaces for every permit issued and so on.

CHART 1
RPPP Street Spaces Compared to Permits Sold in 2014



Source: Pittsburgh Parking Authority and Department of City Planning

Having an accurate count of available spaces would allow DCP to examine outliers such as BB, CC, and DD and ascertain if they are a true indicator of parking congestion and thus seek remedies to the situations, or if it is an error in the data.

Finding: Twenty (20) districts have more permits issued than street spaces available, with eight of the nine largest districts (those with 750 or more permits issued) in this category.

RECOMMENDATION NO. 1:

A complete inventory of spaces that accurately captures all the available parking would be useful in creating a parking plan that recognizes commercial and tenant parking availability more fully. The parking space inventory should include all categories of available spaces for planning purposes. Recently, DCP personnel have started to include these figures in their reports.

The Department of City Planning Duties

The Department of City Planning (DCP) is the agency that processes the requests for Residential Parking Permit Program (RPPP) areas. Its duties include verifying residential interest, determining the neighborhood parking situation and making a recommendation to the City Planning Commission (CPC) regarding the suitability of the requested designation. It also recertifies the need for continued RPPP status every 4 years.

Designation of an RPPP Neighborhood

To be eligible, a RPPP area must be impacted by non-resident vehicles for extended periods of time during the day or night, on weekends or during holidays, and each newly created residential parking permit district must guarantee selling at least fifty (50) permits per City Code Section 549.04 (a).

After evaluation by DCP, the request to be designated as a RPPP area is subject to approval by the CPC and then City Council. The RPPP designation criterion, as shown on its website, requires that a minimum of 100 spaces are needed to establish a new RPPP area.

Finding: Currently, seven (7) of the 37 areas use fewer than 100 permits, and two (2) of these areas support fewer than 50 permits. This is because it was not until 2008 that the Pittsburgh City Code was amended to set a minimum number of permits to be sold per permit area.

Certification Process

The RPPP certification process begins with a minimum of twenty (20) requests from residents of a neighborhood. The RPPP Administrator then organizes a community meeting to discuss the parking situation and distributes petitions to residents so they can gather signatures of interested residential households. It is a residential-driven initiative with little initial input from business/commercial/institutional entities within the district.

The receipt of a verified petition by the RPPP Administrator with the signatures of at least seventy percent (70%) of households in each block-face (one side of a city block) in the residential area will trigger a parking study to determine whether a residential area is eligible for

residential permit parking. In determining whether an area should be designated as a residential parking permit area, DCP performs a study that takes into account these factors:

- The need of the residents for residential parking and their willingness to bear the administrative cost in connection therewith, as expressed by their petition;
- The extent to which the legal on-street parking spaces are occupied by motor vehicles during the time period proposed by parking restrictions;
- The extent to which the parking in the area during the period proposed by parking restrictions are commuter vehicles rather than resident vehicles;
- The extent to which motor vehicles registered to persons residing in the residential area cannot be accommodated by the number of available off-street parking spaces;
- A determination that at least seventy-five percent (75%) of legal parking spaces are utilized during peak periods as determined by the parking study; and
- A determination that at least fifteen percent (15%) of the current spaces are utilized by non-residents for more than two (2) hours.

Within thirty days of the completion of the study, the CPC will be presented with the survey results during a public meeting without public input (only Commission members are permitted to comment during this first presentation). Following the initial briefing, the plan is voted on after a final presentation to the CPC and then the public is invited to provide input. If the plan is accepted, boundaries of the residential parking area, the days of operation and time limitations must then be set by the area's residents.

After the plan is approved by the Commission, it must also be approved by City Council. The parking district becomes active after these approvals and after it is physically designated by signage provided by the City's Department of Public Works (DPW).

Finding: The lag time between City Council's approval of a RPPP district and the area's signage posting has been estimated to be up to six months.

The RPPP area cannot be enforced until the borders and hours are posted. The lag time is less during the winter and longer during the summer, correlating with the workload of the DPW Paint Shop. This is an unfair position to put residents in, as it asks them to buy permits without benefitting from enforcement.

Finding: Residents are able and encouraged to purchase permits at the time of the permit area approval, however enforcement is not active until after signs are posted in the area.

RECOMMENDATION NO. 2:

The RPPP Administrator should work closely with DPW to post a newly approved RPPP area within 30 days of approval. For example DCP could notify DPW when City Planning

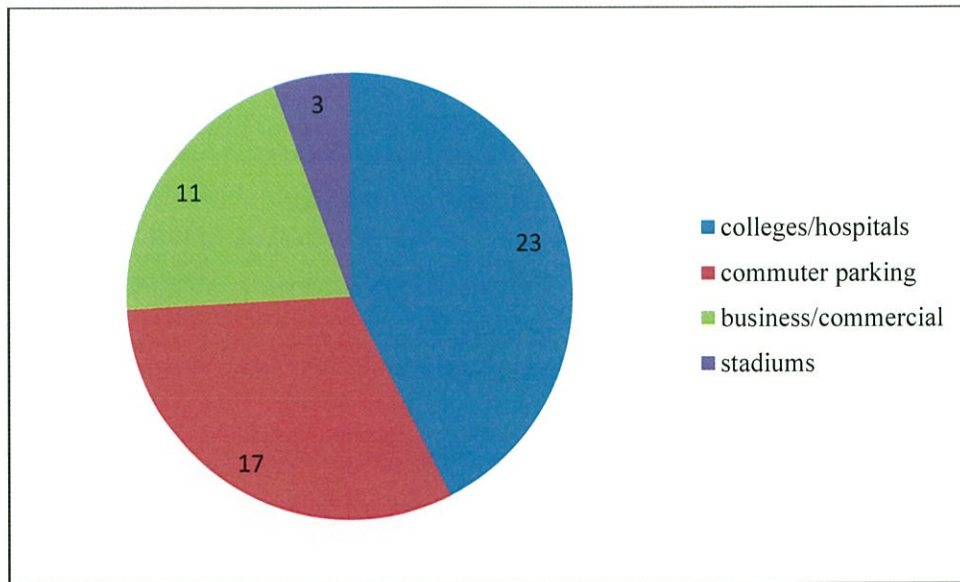
Commission approval has been granted so DPW has ample time to schedule the job once the area is approved.

Communities request RPPP designation because of residential population density competing with impacters such as institutions, businesses, or public transportation hubs nearby. The public comment session can sometimes be contentious, as residential and non-residential parking issues often clash, particularly in regard to rush hour parking times. Therefore, not only is defining the permit parking area's borders important, but the days and hours of enforcement are also key issues.

Parking Impacters

According to the RPPP designation/recertification reports, four major impacters on residential parking congestion were identified: colleges/hospitals (23 or 60.5%), commuter parking for transit connections (17 or 44.7%), business/commercial (11 or 28.9%), and stadiums/arenas (3 or 7.9%).

CHART 2
Impacters on Residential Parking Permit Areas by Count



Source: Department of City Planning reports

The majority of RPPP zones (60.5%) are impacted by major healthcare and/or educational institutions, but a large number (44.7%) cite commuter parking as an issue. Oftentimes, a community is faced with more than one impacter. The business/commercial district impact is often a heated issue because of differing parking needs of residents, and the business' employees and customers.

Institutional Parking

Many residential parking issues are centered on major medical and educational institutions, and their presence creates commuter-related parking congestion caused by employees, students and clients. While institutions contribute to the need for the RPPP, they do not directly impact permitted on-street parking, as there is no provision that allows for their employees to receive a permit.

Major institutions include parking considerations in their Institutional Master Plans (IMP) which provide a forum for public discussion and then are approved by the CPC and by City Council every ten years. However, the spaces provided in the IMP are sometimes inadequate to meet the parking demands. Most institutions also have parking lots and garages close by and provide satellite parking sites with shuttle service to help alleviate that demand.

However, they do cause secondary parking problems when employees, clients and students attempt to find parking that is both free and convenient to the institution.

Commuter Parking

Outlying residential areas serviced by public transit routes often become congested during business hours because of transit riders who travel to the City by personal vehicle, then switch to public transit to reach their final destination to avoid the inconvenience and cost of parking in a busy institutional or commercial district.

Port Authority of Allegheny County officials have met with City Planning officials in the past regarding this issue, but do not plan to construct any new City-based Park and Ride lots. The Port Authority currently operates just four Park and Ride lots in the City, none of which is in a RPPP area.

Finding: Commuters will park in residential neighborhoods in order to take public transportation at a more convenient access point. The creation of public transit routes creates parking issues for affected neighborhoods.

RECOMMENDATION NO. 3:

DCP should remain proactive with any upcoming projects initiated by outside agencies and provide input with respect to residential parking concerns.

Business Parking

Businesses require parking for both their employees and their customers. This often creates conflict between employees and residents especially during the morning and evening rush hour periods when both groups jockey for parking spots. To help with short term parking concerns RPPP areas have one or two hour grace periods.

The businesses should realize that free employee parking is not often viable in City neighborhoods and should consider other solutions, such as providing offsite parking for its workers, vanpools, employee transit passes, ride-sharing, or biking accommodations among others. Businesses that choose to locate their establishments in mixed-use areas should consider their employees' transportation costs as part of the cost of doing business and seek ways to lessen their neighborhood parking footprint.

The RPPP's first priority is to provide adequate on-street residential parking. While it would be ideal to provide the same for local business employees, the reality is that City spaces are limited. Business interests should be considered during the designation process, but may depend more on their own planning to provide employee transit solutions.

In 7 of the 38 Residential Parking Permit Program areas (including the KK area), there exists a strong commercial district, as determined by the amount of business passes issued (20 or more businesses that had permits in a district was considered a strong presence).

Finding: Commercial/retail concerns are not fully considered in the earliest stages of RPPP determination because of the residential-driven nature of the process. Commercial entities are sent a questionnaire and informed of the community meeting after the residential petitions have been signed and verified.

Finding: Customer parking is sometimes an issue, but with one or two hour grace periods for on-street parking and metered parking available in most business districts, it is not as pressing a matter as employee parking for commercial entities.

RECOMMENDATION NO. 4:

DCP should recognize that there is a symbiotic relationship between residents and businesses. Residents need business and business need residents. Inclusion of both in all stages of an areas development is important and beneficial to both and should be a priority.

Other Cities Business Parking Solutions

Desman Associates, a parking design consultant firm, was retained by the City of St Louis to conduct a comprehensive study of that city's parking situation. One recommendation was the establishment of 'Business Parking Spaces' for commercial entities who find themselves

in densely-packed residential areas. The city reserves, for an annual fee, a limited number of parking spots in the business' vicinity.

Elsewhere, Grand Rapids offers a business parking model in areas where there is available parking. A "commuter permit" is issued to non-residents who work at recognized traffic generators (for example, institutions in close proximity to an residential parking permit area that create significant parking demand, such as hospitals or commercial properties). Commuter permits are available as monthly permits at a rate of \$70, and are issued on a first-come first-served basis dependent upon availability. Resident parking is priority in RPP areas and issuance of commuter permits is determined by resident occupancy rate and optimal parking space utilization as determined by Parking Services.

Tenant Parking

Another impacter, although not designated as such by the DCP, is tenant parking. City Code provides that each rental unit be considered a household and be allowed three residential permits.

Finding: The areas with the highest concentration of multi-unit apartment buildings with residents holding more than ten permits per street address are West Oakland/Bellefield, Oakland and the Shadyside communities.

While there is no evidence of misuse in Pittsburgh, apartment parking has proven problematic in other cities. In Washington DC's Capitol Hill neighborhood, there is evidence of tenants in large apartment buildings renting their parking spaces for \$100-200 a month while parking their vehicles on the street for the RPPP permit price of \$35 a year. Tenants who are allocated their own parking spaces sometimes use an RPPP permit as a 'convenience permit,' e.g. closer parking to unload groceries, or allowing their guests to park in the private lot and then using their permits to park on the street.

Finding: City Code does not address those apartments that provide their tenants with off-street parking, nor does DCP include off-street parking in its district design.

The Amberson Apartments, whose management provides parking to their tenants but has no room for visitor's parking, abuts an RPPP area. Amberson management approached the City and received permission to keep a small amount of visitor passes in their office so that building residents could sign out passes on an as needed basis.

RECOMMENDATION NO. 5:

Apartment tenants with dedicated off-street parking included as part of their lease may not need three residential parking permits per unit, and restricting the amount of permits allotted to these individuals should be examined. Tenants located in RPPP areas should in all cases have access to visitor and specialty permits.

Nighttime Hospitality Parking

Areas that support a nighttime hospitality economy (bars, restaurants, theatres, etc.) are often the most contentious, as residents find their parking spots in demand even after the traditional work hours have concluded. Residents are often squeezed out of spaces until after the hospitality venues close. There have been many concerted efforts to find solutions for this problem, culminating in partnering with the Responsible Hospitality Institute (RHI) to prepare the City's 2012 Sociable City Plan.

The RHI identified Oakland, Lawrenceville, and South Side, three of the City's most congested neighborhoods that already host 15 of 38 RPPP zones, as City nightlife centers. According to RHI's *Sociable City Action Plan*:

“Transportation and mobility management are increasingly important with the growth of young adults who prefer nighttime socializing. Many cities are revamping transportation options to better integrate public transit, bicycles, parking efficiency, taxis, pedicabs, shuttles and pedestrian-friendly access to business districts. While each of these modalities is integral to support the traditional 9 am to 5 pm weekday schedule, they are equally important to support the nighttime economy, especially late at night when risks are greater because of dim lighting, fatigue and the influence of alcohol.”

Currently, enforcement of RPPP areas until late at night is now taking place in the South Side and South Oakland. In this case, RPPP areas not only help residents find parking nearer to their homes but should theoretically alleviate some of the noise and petty vandalism that has gone along with this nighttime hospitality.

However, a major problem is the concentration of nighttime business establishments. It is estimated that South Side entertains 21,000 visitors on weekend evenings. In that community, the Parking Authority has 231 surface lot spaces. Cars overwhelm the neighborhood's ability to provide parking.

There are several establishments in South Side and presumably other areas that seat patrons by the hundreds, yet have no parking responsibility. This is because the responsibility to provide parking in the Zoning Code is based on square footage rather than occupancy.

It is in the City's best interest to encourage successful business establishments as well as to maintain attractive residential areas for people to park and live.

RECOMMENDATION NO. 6:

DCP should recommend a change in the Zoning Code so that new business parking requirements are based on occupancy rather than square footage. By looking at the impact to parking in terms of occupancy, the effect on residential parking can be anticipated and solutions considered in advance.

Finding: In the latest area soon to be established (Area KK, South Side), the surveys occurred between 10:30 am and 1:30 pm. While they verified that the area qualified for RPPP inclusion during the daylight hours, it did not examine the nighttime parking issues in that neighborhood.

RECOMMENDATION NO. 7:

In neighborhoods impacted by nighttime activities, the parking survey should include an evening activity report or a report during a sports game or concert so that the decisions about alternate parking and the hours of enforcement can be based on empirical evidence.

Stadia/Arenas

Event traffic for the stadium/entertainment complex on the North Shore and the CONSOL Energy Center creates neighborhood parking disruption on a regular basis. PNC Park/Heinz Field draw crowds in the tens of thousands while holding approximately 125 events between the stadia every year. Stage AE averages more than 110 events per year, and CONSOL Energy Center hosts over 150 events annually (event numbers compiled from venue websites).

Three neighborhoods - F (East Allegheny), G (Allegheny West), and W (Crawford-Roberts) - are directly impacted by these venues. District P (Uptown/Bluff) is also affected to a lesser degree by CONSOL Energy Center and Duquesne University's Palumbo Center traffic. The enforcement hours for these areas are Monday through Saturday from 7 AM to 7 PM, except for area W, which has enforced hours until 8:30 PM. Area F has a two hour grace period while the others have a one hour grace period. Grace periods allow visitors to park in these areas but require them to leave before the end of the grace period, or risk being ticketed.

The areas are patrolled by the Parking Authority officers periodically during enforcement hours. Generally, City police enforce City traffic laws during events.

The survey results of the recertification reports for the four affected venue districts show a 67% increase in available residential parking spaces since attaining RPPP designation. This was taken during weekday daylight hours, when presumably the local venues were not hosting events. Interviews anecdotally noted that entire neighborhoods are flooded with cars parked for events, particularly in the North Side with its stadia and entertainment venues, on evenings and weekends. The North Side enforcement days are Monday through Saturday, from 7AM to 7PM, and Sundays 12 PM to 6 PM.

Finding: City Planning does not conduct surveys during the nighttime or during weekend events that are causing the most acute parking problems.

RECOMMENDATION NO. 8:

The DCP certification and recertification reports should incorporate event information gathered during event hours in areas impacted by sporting and concert venues. This would include an event parking survey and the necessity of Parking Authority enforcement during events.

Stadia Enforcement

An average of 2,389 RPPP violation tickets were issued annually in 2013-14 for 985 parking spaces in stadia/arena F, G, and W areas. That is a ratio of 2.4 tickets issued per street parking space; the average for all RPPP areas is 3.5 tickets issued per street parking space.

Finding: Parking enforcement around Stadia areas yields less tickets than other RPPP areas. This could be because enforcement hours do not always overlap with the events that cause the parking problems.

RECOMMENDATION NO. 9:

DCP should consider rewording signage for the Stadia/Arena areas to not only include days and times of enforcement but to say that this RPPP area is also enforced during all event times. This generic language will allow enforcement on an as needed basis when parking pressure is at its highest. The Parking Authority will also need to keep an event schedule on hand to ensure that enforcement happens during events in these RPPP areas.

Alternative to Ticketing

In any Stadia/Arena affected area, if residents report that parking pressure is still a problem during event times, a possible model DCP could examine and manipulate to fit local conditions is Chicago's nighttime baseball game parking areas. It is designed to preserve legal on-street parking for residents immediately surrounding Wrigley and U.S. Cellular Fields during baseball games. When a violator is found during event hours, the vehicle is immediately towed instead of ticketed.

Flexible Parking Design and Alternative Transit Options

The original Chapter 549 establishing RPP areas was driven by institutional intrusions on residential neighborhoods and was structured to protect residential parking privileges. However, communities have become more mixed use with residential, rental, retail, commercial, hospitality, and institutional uses all impacting parking. Conversations with local district representatives indicate frustration with the one-size-fits-all approach of City Code regarding Residential Parking areas.

RECOMMENDATION NO. 10:

With the diversity of impacters, some of which combine in certain districts. DCP should ask City Council to consider creating language to make Chapter 549 a more flexible tool.

Likewise, multiple transit options such as bike lanes, public transportation, taxis, Uber/Lyft and alternate transport such as pedicabs (like those used in the Strip District) are not considered in the design of a RPPP district. Multi-modular stations such as the proposed East Liberty Transit Park combine many elements of transit in one location and residential parking should be considered when these areas are designed.

This was recognized by City Planning in its designation report for Area KK submitted to council. The report included a section entitled “Alternatives for Non-Resident Parking” which lists the public parking lots in the area and the number of spaces within them, and transit options throughout the area.

RECOMMENDATION NO. 11:

All alternatives should be considered when designing a RPPP area. The program objective should be to find a holistic approach to reducing street congestion, incorporating the needs of the integrated community rather than solely focus on residential parking.

Recertification Process of RPPP Areas

Every four years the RPPP area must be recertified by DCP to verify that the need for permitted parking remains, per City Code section 549.06 (c) & (d), which states in part “...the Parking Permit Officer shall certify...that 70% of households, by petition, survey, or combination thereof, still desire participation in the program”. It should be noted that the various program areas’ permit years do not follow the calendar year, but begins the month that the program area was established. Surveys are mailed to each household holding a permit to gauge the desire to remain an RPPP area.

The recertification process also includes a community meeting with permit holders and a parking survey performed by DCP to determine if the parking congestion impacter still exists and submission of the recertification report to the CPC and City Council.

The 70% approval rate for continued status as a RPPP zone is based not on the number of residents or permit holders, but on the replies to the survey questionnaires returned by the area residents. This is acceptable by the letter of the law.

Finding: The percentage of questionnaires returned during the recertification process in 2013 - 2014 was, on average, 15.1% of the permit holders. The survey represents the residents' concerns and satisfaction rating, but the return rate is quite low.

RECOMMENDATION NO. 12:

A larger representation of residents' opinions should be sought when recertifications are due. City Planning should devise a method that will generate greater residential participation in the recertification process. It should join forces with the PPA to require a completed residential questionnaire as part of the permit renewal process during recertification years, perhaps phased in as the permit process transitions online in the future.

Recertification Surveys Results

The results of the recertification surveys taken by City Planning in 2013-14 were:

- Of the 3,966 surveys sent out, 601 responses (15.2%) were returned.
- 80.5% of the respondents wished to keep RPPP area status
- 70.4% of the respondents believed the RPPP status either kept their parking situation the same or improved it while 27.6% believed it made parking conditions worse.
- 73.4 % of the respondents believed their RPPP area boundaries were correct; 63.7% believed that the time limitations were correct, and 57.6% were satisfied with the area's enforcement.

Finding: The majority of the survey respondents found the RPPP designation to be acceptable to varying degrees, with the most dissatisfaction being registered over enforcement issues.

Finding: The recertification reports included all the information required by City Code, but was not consistent in presenting the survey results from the permit holders. Having a standardized recertification report would help Council and the public better understand the survey results.

Finding: The designation/recertification reports other than for 2013 were not posted on the City Planning website although they were available in electronic format to the auditors.

RECOMMENDATION NO. 13:

The Residential Parking Administrator should prepare a "boilerplate" report format to provide consistency in presenting recertification survey results. The most recent designation or recertification reports for all RPPP areas should also be available on the web for public viewing.

Decertification Process of RPPP Areas

There is no defined City process that allows for the decertification of a RPPP area between recertification years. The only decertification of a RPPP area in the program's history was made at the residents' request for Area I, and it was reestablished two years later when St. Francis Hospital was replaced by Children's Hospital. City Planning accepted a petition signed by 70% of the Area I residents to decertify while between recertification cycles, which appears to be a reasonable procedure as the City Code is silent.

Finding: City Planning accepted a decertification petition by using a process that copied the designation process. While not currently part of the City Code, it is a proposed amendment to the City Code by the RPPP administrators.

A proposed amendment to the City Code presented by RPPP Administration reads "A residential parking permit area shall be deemed eligible for removal and termination of the Residential Parking Permit Program if, based on the petitions prescribed by the Parking Permit Officer, seventy (70) percent of the households in that residential parking area petition in favor of removal from the program. On verification of the signed petition, the Parking Permit Officer will recommend to City Council the removal of the residential parking program in that area or block. Once the removal is legislatively made effective, the designated block or area must wait two (2) years before being considered for permit parking again".

Finding: Recertification reports are tasked to verify that the RPPP areas not only remain supported by the residents, but are still negatively impacted by non-residential parking.

RECOMMENDATION NO. 14:

This proposed amendment should be considered by City Council to provide a defined decertification process in Chapter 549 and if the parking impacter is no longer present at recertification, DCP should recommend removal from the RPPP unless there are mitigating circumstances.

Pittsburgh Parking Authority

The Pittsburgh Parking Authority (PPA) is responsible for the registration of vehicles within a RPPP area, the distribution/administration of the permits and the enforcement of parking rules. The Authority does not only enforce RPPP regulations in the designated areas, but also all other parking regulations. An RPPP zone, in addition to meeting the permit requirements, also must follow all other traffic laws.

The RPPP receives fees from the permits and passes but it does not cover program costs. As a remedy the outstanding costs are recovered from citation revenues. The remaining ticket revenue is deposited into the City's General Fund.

RPPP revenue and costs for 2013 and 2014 were:

2013: \$364,324 revenues - \$402,210 costs = (\$37,686)

2014: \$377,062 revenues - \$402,652 costs = (\$25,590)

Finding: In 2013 and 2014 the RPPP operated at a loss however, RPPP fine revenue covers any operating costs not paid for from program permits and pass fees.

Permit Activity

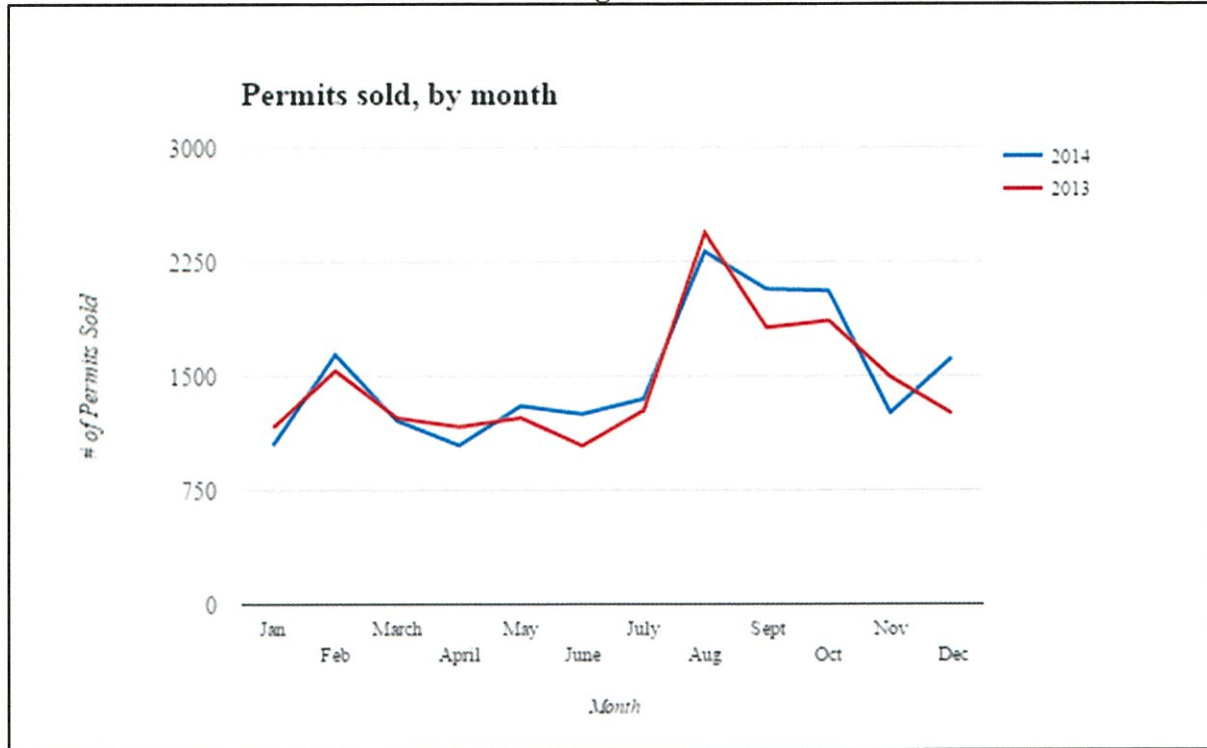
The permit and pass registration and upkeep of each RPPP district is performed by two part-time employees, who also process mail-in paperwork and answer walk-up and phone inquiries. The actual workload is spread through the year as different RPPP districts have different start dates for their permit years. Every month there are three or four districts that become due for annual registration.

The permit workload is spread somewhat equally through the year, with an increase in activity during the August-October time period, when permit requests from students peak and leases for tenant properties traditionally begin. Visitor pass requests are more evenly distributed across the year. This is shown in Chart 1.

Finding: The staggered permit years for districts allows for a more evenly distributed workload, which allows the staff time to process the work and provides more timely service for the permit holders.

The number of districts, and therefore the number of permits and passes to be processed, has increased from 32 RPPP neighborhoods in 2013 to 38 (including South Side District KK) in 2014, as shown by Table 2. This table includes permits, visitor passes and replacement permits. Replacement permits are permits reissued for various reasons and is discussed later in this audit.

CHART 3
Residential Parking Permits Sold 2013-2014



Source: Pittsburgh Parking Authority

TABLE 2
PERMITS, VISITOR PASSES & REPLACEMENT PERMITS
for 2013 & 2014

Month	Permits 2013	Passes 2013	Replacements 2013	Permits 2014	Passes 2014	Replacements 2014
January	1,166	905	30	1,043	680	27
February	1,539	1,173	17	1,640	1,300	12
March	1,227	872	16	1,205	868	40
April	1,169	827	30	1,043	738	38
May	1,228	792	32	1,302	840	34
June	1,043	735	24	1,247	822	31
July	1,276	835	41	1,347	895	30
August	2,445	1,614	32	2,315	1,520	25
September	1,820	1,287	7	2,068	1,475	32
October	1,866	1,372	23	2,056	3,607	28
November	1,496	1,083	23	1,255	868	18
December	1,254	883	36	1,616	1,142	23
Totals	17,529	12,378	311	18,137	14,755	338

Source: Pittsburgh Parking Authority

Finding: The transactions processed by the RPPP staff increased from 30,218 permits and passes handled in 2013, to 33,230 handled in 2014, an increase of 9.9%. (The totals are slightly different from the 2014-15 permit totals because of overlap between the fiscal year and the sales year.) Now with the certification of the KK area, the permit load will continue to increase.

Finding: Two (2) part-time staff are responsible for the day to day operations of the RPPP office which, in 2014, brought in \$377,062 in revenue.

RECOMMENDATION NO. 15:

The Parking Authority should consider making the RPPP customer service staff positions full-time with benefits due to the specialized knowledge required of the staff and the consistent and growing annual workload. Additional revenue, with the KK parking area permits being sold and ticket revenue, will be coming in so the increase in personnel costs would not be a financial burden to the organization.

In the July 12, 2016 issue of *Banking & Finance, Careers: The Next Level, Economy, Editor's Picks, Leadership & Management, Why We're Giving Our Employees a Raise*, Jamie Dimon, Chairman and CEO of JPMorgan Chase & Co. states:

And it is true that too many people are not getting a fair opportunity to get ahead. We must find ways to help them move up the economic ladder, and everyone — business, government and nonprofits — needs to play a role.

A pay increase is the right thing to do. Wages for many Americans have gone nowhere for too long. Many employees who will receive this increase work as bank tellers and customer service representatives. Above all, it enables more people to begin to share in the rewards of economic growth.

And it's good for our company, helping us attract and retain talented people in a competitive environment.

For the PPA to make customer service employees full time with benefits is a solid and fair business practice. Job stability empowers employees to work hard and insures them a better quality of life. It also eliminates the cost of not having to train new people.

Online Registration

As noted in the PPA 2013 audit and as still the case, the PPA does not offer online registration and renewals as done in several other cities. The Parking Authority has begun the process of switching to paperless registration pending budget considerations, including plans for a staffed help desk for those who do not have internet access.

Finding: PPA does not offer online registration for RPPP users.

RECOMMENDATION NO. 16:

The PPA should offer online RPPP permit registration, renewals, replacements, and passes while continuing to offer mail, phone, and walk-in options for those without internet access. Online RPPP permit registration would increase the efficiency of the RPPP staff and add convenience to the consumer.

Registration Procedure

The registration procedure for a residential parking permit requires the individual to visit the RPPP office downtown or download a form available online, then make copies of the required paperwork and mail everything to the office. This paperwork includes: proof of residency (current lease or sublease, current utility bill, or a notarized letter from the property owner validating the address of the registrant), proof of vehicle registration (pink slips accepted for newly purchased vehicles, and out-of-state registrations are acceptable), and a current and valid driver's license.

In addition to matching residential status and vehicle ownership, several other cities such as Boston, Berkeley, Wilmington, and Denver run a background check on whether the vehicle has any outstanding parking violations in the cities' database before granting a permit. These cities will not issue a parking permit until all monies owed on outstanding violations are collected. Allowances are made for citations currently being appealed.

Finding: The PPA administers a website where an individual can look up and pay any outstanding parking citations.

RECOMMENDATION NO. 17:

The PPA should determine that no vehicle is registered in the RPPP if it has an outstanding City parking violation. The authority to perform a background check and to deny a permit because of outstanding citations should be proposed as an amendment to City Code Chapter 549. The PPA website is already configured to accept citation payments and lookup citations via license plate number.

Permits & Passes

Currently, the RPPP offers residential parking permits limited only by the number of vehicles registered to household residents. As City Code mandates that no more than three

unrelated persons can inhabit a dwelling, rental properties are limited to no more than three permits per rental unit and one visitor pass per rental unit.

As noted before, the RPPP areas often suffer from fewer spaces than vehicles permitted to park. The City does not address this issue. In other cities examined, the amount of permitted parking permits issued are limited by the amount of parking spaces available or cities allow the residents of the parking district to vote on self-imposed limitations to the number of permits and visitor passes a resident can purchase. Others, like Pittsburgh, do not impose a cap.

The permits issued by the Parking Authority were examined to determine the number of permits registered to a single household. As rental household units are allowed to have three permits per unit, any household that was issued four or more permits was considered to be a high volume parking consumer.

Of 17,907 permits examined that were issued between September of 2014 and August of 2015, 48 permit holders were found to possess 4 or more permits. This is less than 1% of the households. Of those 48 households, 36 were residential, 9 were apartment house addresses and 3 were home-based businesses. Only 4 of the addresses had more than 5 vehicles registered.

Finding: The RPPP does not appear to have a problem of households hoarding passes.

Vehicle Weight

A vehicle must meet the standard of City Code Section 549.02, which defines a motor vehicle as “An automobile, truck, motorcycle or other motor-driven form of transportation not in excess of 6,000 pounds of gross weight or vehicles 6,000 to 10,000 pounds of gross weight upon verification of the necessity of use in the residential parking permit area”.

Some cities define vehicles by model, such as motorcycle, Sports Utility Vehicle, van, etc. This system is somewhat complicated administratively, and also problematic as several hybrid-model vehicles could fall into multiple vehicular definitions.

Using vehicle weight as the RPPP determinant offers a clear definition. However, since the original legislation (Ordinance 30 of 1981 as later amended by Ordinance 2 of 1991) was enacted, vehicle weights have increased, with some models weighing between 7,000-7,500 pounds. The RPPP administrators are proposing that the weight limit be increased from 6,000 to 7,000 pounds.

Finding: Vehicle weights, the primary factor in determining if a vehicle is eligible for RPPP registration, have increased in the past twenty-four years and in that time, average personal vehicle size has increased for many models.

RECOMMENDATION NO. 18:

The weight of a vehicle for RPPP inclusion without additional verification should be increased to 7,500 pounds in City Code Section 549.02.

Residential Parking Permit Fees

The fee for a one year Residential Parking Permit is \$20. Online research was conducted examining the Residential Parking Program fees charged in ten other Eastern and Midwestern cities. The results are exhibited in the following table:

TABLE 3
ANNUAL FEES
Charged by Various Eastern/Midwest
Municipalities
for a Residential Parking Permit
as of June 2015

CITY	FEE
Boston	\$0
Cleveland	\$10
Hoboken	\$15
Arlington	\$20
Baltimore	\$20
<i>Pittsburgh</i>	\$20
Chicago	\$25
Miami	\$25
Minneapolis	\$25
Philadelphia	\$35
Washington DC	\$35

Finding: Pittsburgh’s annual \$20 residential parking fee falls within the range the \$20-25 median fee of other selected Eastern cities. It has been unchanged since 1991. The Authority operates the RPPP at a deficit.

RECOMMENDATION NO. 19:

The PPA should consider petitioning City Council to increase the Residential Permit fee from \$20 to \$25.

The modest raise would allow the RPPP to operate without a deficit and would represent a modest increase for permit holders. With 17,905 permits sold per year a \$5 increase would add

\$89,525 a year to the program. This amount would eliminate any deficit and allow money for full time staff. The cost of \$25 per permit falls within the range of other Eastern and Midwestern cities.

Prorated Permits

Although City Code Section 549.13(a) calls for a prorated charge of \$10 for registration of six months or less, the annual \$20 fee is the cost charged to registrants regardless of registration date by the PPA to capture administrative costs which remain fixed. The great majority of registration payments are made at the beginning of the program year, so this prorated rate is of limited impact. The PPA has an amendment to the City Code prepared to send to City Council to rectify this situation.

Finding: The fees charged for Residential Parking Permits of six months or less do not match those called for in the City Code.

RECOMMENDATION NO. 20:

Residential parking permit fees should be established at one rate, as the fee is used to cover administrative costs, which are the same no matter the length of time of the permit.

Replacement Parking Permits

The need for a replacement parking permit occasionally arises. If a new vehicle is purchased and the old permit is scraped off the window and presented to the RPPP office along with your new car registration, the replacement permit is free. If the old permit is not removed and the license plate is the same, the replacement permit is \$5. If the license plate has changed, the permit holder must submit a notarized letter stating that the permit sticker was not removed and the plate has changed. The replacement fee in this instance is also \$5. All of the above circumstances also need the new vehicle registration completed and attached.

Finding: The PPA collects a great deal of information during its registration of permit holders. However, it does not compile a breakdown of household statuses, be they homeowners, tenants or students.

RECOMMENDATION NO. 21:

The Parking Authority RPPP staff should collect a permit holder's residential and student/non-student status for analytical and program management purposes.

Visitor's Passes

The PPA can issue one visitor parking pass per household/business of a residential parking permit area, whether or not the resident is a permit holder. A visitor's pass can be purchased at the same time as the resident's permit, or as needed. The fee for a visitor's pass is \$1. In 2014, the Parking Authority sold 14,755 visitor passes, an increase of 19% from the 2013 sales of 12,378 visitor passes.

The visitor's pass is treated the same as a regular permit, except that the vehicle is limited to parking in the RPPP zone for no more than three consecutive weekdays (Monday through Friday) in a month unless approved by the enforcement office. The visitor's vehicle is then subject to ticketing at any time during the calendar month if found parked in the permit zone again with the same pass.

A RPPP resident is not permitted to use the pass for his or her own vehicle and the pass cannot be legally given to anyone except a visitor or guest to his or her address. For businesses within the permit area, the visitor's pass purchased by the business cannot be used by anyone except a transient visitor to the business address, i.e., not an employee of that business.

Other cities have addressed the issues of visitor parking pass use through a variety of methods. Boston designates some spaces on the street as visitor's parking and limits visits to a few hours at a time. Some cities use visitor placards and/or temporary passes, or sell visitors passes in a multiple unit packages. Some cities make no provision for visitor parking at all.

Other visitor passes are time-limited (usually daily), and available for purchase by residents. In cities with license plate reader technology, a visitor's vehicle can be registered, often online, to allow parking privileges. Costs for these passes range from free to a nominal daily charge. The numbers of passes a resident can purchase are usually limited in nature. The number of visitor passes allowed in other cities is sometimes governed by regulation and sometimes determined by a popular vote taken by the residents.

Finding: The majority of cities surveyed issued visitor passes for varying time frames, so there is no consensus on time limitations. All offered the visitor passes for no or nominal cost.

The visitor's pass program in Pittsburgh has remained virtually unchanged in the last decade. The PPA has advocated for an increase in the cost of a visitor's permit for financial, administrative and enforcement reasons. The PPA has created a proposal for an overhaul of the visitor's pass system to include a tiered pricing scale for extended visitors and the replacement of physical placards by license recognition technology. The PPA also proposes to allow each household to purchase up to three permits at a time.

Finding: The recertification reports of 2013-2014 determined that the average number of registered visitor vehicles parked in an area makes up approximately 12% of the total permitted parked vehicles, so non-residential visitors generally do not cause parking congestion.

RECOMMENDATION NO. 22:

City Council should consider amending the City Code to allow for the issuance of visitor passes that are available for different lengths of time and could be sold via a tiered pricing structure as per the Parking Authority's recommendation.

During interviews with City Council staff, the selling of visitors passes were considered a problem in some commercial RPPP neighborhoods. While the PPA does not believe that this is a matter of consequence, the current system of paper passes can lend itself to this type of misuse. The Parking Authority RPPP staff hopes to have all permits and passes entered on a database that can be accessed via license reading technology, and are currently in a transitional stage of switching the hybrid paper passes/handheld device registration to this technology.

Finding: The PPA is investing in a license reading technology to streamline the parking enforcement process.

RECOMMENDATION NO. 23:

The PPA should continue to upgrade its administrative and enforcement tools with available technology and transition from a paper-based permit system. It should select a platform that can share information with both the Public Safety Department and DCP.

Finding: A single visitor's pass can be sold to any resident of a RPPP area, even if they do not hold a residential parking pass themselves. In the past year, there were slightly over a thousand visitor passes issued to residents who did not have a permit, generally because the resident does not own a personal vehicle.

RECOMMENDATION NO. 24:

The RPP should consider slightly raising the cost of visitor passes sold to people who don't have a residential permit. This is because these types of visitor passes take longer to process than a visitor's pass of someone who already has a parking permit.

Temporary Passes

Currently the RPPP does not offer any type of temporary pass for anyone who is making a permanent move to Pittsburgh. Drivers with out-of-state license plates are given a regular parking permit.

Temporary passes serve as a transitional parking permit for new residents who come from out-of-state and need time to register their vehicles. According to Pennsylvania state law, all new residents are required to make application for Pennsylvania title and registration of their vehicle(s) within 20 days of establishing residency in Pennsylvania. A temporary pass, sold for a limited amount of time, would aid new residents in making the transition to their new homes.

Of 17,907 Residential Parking permits issued in 2014-15, 2,256 (13%) were issued to vehicles that had out-of-state registration. Because the PPA does not collect data about these permit applicants it is unknown how many belonged to students.

Finding: Without a temporary pass permit, when the PPA switches to the license plate reader technology out of state permit holders who change car title and plates to establish residency in Pennsylvania will be ticketed.

RECOMMENDATION NO. 25:

The RPPP should consider offering 45-day temporary passes for residents who just moved into Pittsburgh from out of state, after which time they either meet the qualifications to switch to a full residential permit or be terminated from the RPPP for failing to meet PA State law.

Employer/Employee Permits

Commercial activity is a major impacter in several neighborhoods. City Code Section 549.07 (b) (2) limits commercial property owners/lessors to one parking permit. Customers of these businesses have the one or two hour grace period window available, which is generally a sufficient time period.

The overall percentage of business permits sold is quite low; 13% of the permits for the East Ohio Street district are business permits, but the overall average citywide is 2%. However, in some districts, there exists interplay between business and residential parking.

Seven (7) RPPP areas are a mixture of residential and commercial buildings. Using 20 permitted businesses located in a district as a determinant, the areas with a heavy business concentration are CC, DD & II in Southside (with KK soon to join); areas F and G in North Side (the East Ohio Street corridor has the most businesses identified in a district with 71), and districts H and JJ in the Bloomfield/Lawrenceville area. These six districts generated 61% (211/344) of the business permits sold.

The issue that causes the most conflict between residents and businesses is employee parking. City Code Chapter 549.07 (b) (2) allows for one parking permit per commercial enterprise in an RPPP area.

This is in line with other cities. The majority of cities surveyed allow local businesses to purchase one or two permits; some do not have any provision for commercial interests located in a RPPP zone. San Francisco allows businesses to purchase one general pass and also up to three passes for company vehicles registered in the name and address of the business.

Other cities, such as Palo Alto and Grand Rapids, do allow businesses to purchase permits at market rate for use by their employees if space is available. These permits are available for \$233 for six months in Palo Alto and \$70 a month in Grand Rapids.

RECOMMENDATION NO. 26:

Increasing the limit of business permits should be considered for smaller neighborhood businesses if the number of available spaces allows for it. Businesses with larger staffs should, as discussed earlier, make arrangements for off-street parking or alternate employee transit.

Commercial Contractor Permits

Several cities offer City-wide parking permits for contractors. Pittsburgh does not offer this category of permit, and as a result, workers servicing a home in an RPPP area can be ticketed if they violate the area's grace period during a daylight call with little recourse available. This was also noted in the prior audit.

Finding: Contractors working during the day in an RPPP area have no legal means to park beyond the grace period and can be ticketed for a parking violation while performing a household service.

RECOMMENDATION NO. 27:

The City Code should be changed to allow for annual City-wide contractor permits for company-registered, marked service vehicles to park in RPPP areas. The business qualifications and a reasonable fee should be determined by the DCP and the PPA.

This recommendation should not affect most commercial vehicular activity, which should be provided ample time by the grace period in the day. Overnight service calls should occur after most areas' enforcement hours' end in the early evening.

Family/Volunteer Caretaker Permits

Some cities provide special permits for unpaid family home care situations, such as eldercare and childcare, which are usually performed by family members or volunteers. The

RPPP staff is currently proposing an amendment to Chapter 549 to allow for the issuance of Medical Parking Permits for caretakers. Individuals within the RPPP zone in these cities can only apply for child care permits if the child is 12 or under, or with a doctor's note if it is an eldercare situation. If limits to the number of permits sold per household are enacted, this permit could be counted against the household limit of the number of permits purchasable.

The 2013 United State Census projected Pittsburgh's senior population (65 years old or more) at 13.8% and that 70.9% of City families with children under the age of six have all parents in the family in the workforce. These figures suggest that there will be a need for elder and child care, which may often be provided by unpaid family members and/or volunteers.

Finding: The United State Census suggests that there will be a need for elder and child care in Pittsburgh.

RECOMMENDATION NO. 28:

An amendment to City Code Chapter 549 should be made to designate a RPPP permit category for volunteer or family eldercare and childcare. The proposed permits should be area-specific rather than City-wide, and as such, should be priced approximately the same as a residential permit, with qualifications and verification standards determined by the Department of City Planning.

Visiting Professional Medical Permits

Medical parking permits are not currently issued, but would provide an annual City-wide RPPP permit for professional health caregivers who visit residents of a RPPP area on a regular basis for extended visitation periods beyond the usual grace period of one or two hours. An amendment to allow for their issuance has been prepared for City Council's consideration by the RPPP staff.

RECOMMENDATION NO. 29:

An amendment to City Code Chapter 549 should be made to designate a RPPP permit category for commercial home healthcare agencies. The proposed permits should be City-wide, and as such, should be priced accordingly with qualifications and verification standards determined by the Department of City Planning.

Enforcement & Ticketing

Once the Planning Commission has approved a Permit Parking Area, the registration and enforcement falls under the responsibility of the Pittsburgh Parking Authority. The PPA is staffed by twenty (20) full time and twenty (20) part-time Parking Enforcement Officers (PEOs).

The RPPP areas are covered by a regularly assigned PEO as part of the officer’s regular patrol route of metered areas. PEOs also enforce street cleaning regulations and posted signage violations.

Areas that are larger and/or feature concentrated metered spaces have more PEOs assigned to it, whereas smaller, less commercial residential areas may not get as frequent patrolling. The PPA responds to complaints from the less-often patrolled areas.

PEOs patrolling RPPP areas must make one patrol through an area and then come back one or two hours later to check on non-resident parkers utilizing the “grace period”. This is especially cumbersome under the current system, which uses a hybrid of paper signage along with database entries. The electronic registration is transacted through a hand-held device by the PEO, who must manually enter the license plate number to check a vehicle’s status.

Finding: The PPA is transitioning from hand-held devices to the much more efficient plate recognition readers, which can be carried personally by the PEO or mounted on a vehicle, as it is now for booting enforcement.

The reader technology has proven itself in other cities. In Denver, since using license-plate reader to enforce two hour limits on non-metered streets, tickets have increased 23%. Additionally, this system can be linked to stolen vehicle databases.

The Parking Authority also has plans to upgrade its software. In addition, it is hoping to increase the number of enforcement officers in the field. So while enforcement currently is lagging due to staff numbers and technology, it appears to be a PPA priority going forward and this should translate into better RPPP enforcement in the future.

TABLE 4

2014 RPPP Ticket Distribution By Geographic Region			
AREA	STREETS	TICKETS	PERMITS
EAST with 24 areas	470 (77.0%)	22,215 (78.3%)	12,413 (77.0%)
SOUTH with 4 areas	74 (12.0%)	13,774 (13.3%)	2,433 (15.0%)
NORTH with 4 areas	64 (11.0%)	2,371 (8.4%)	1,367 (8.0%)

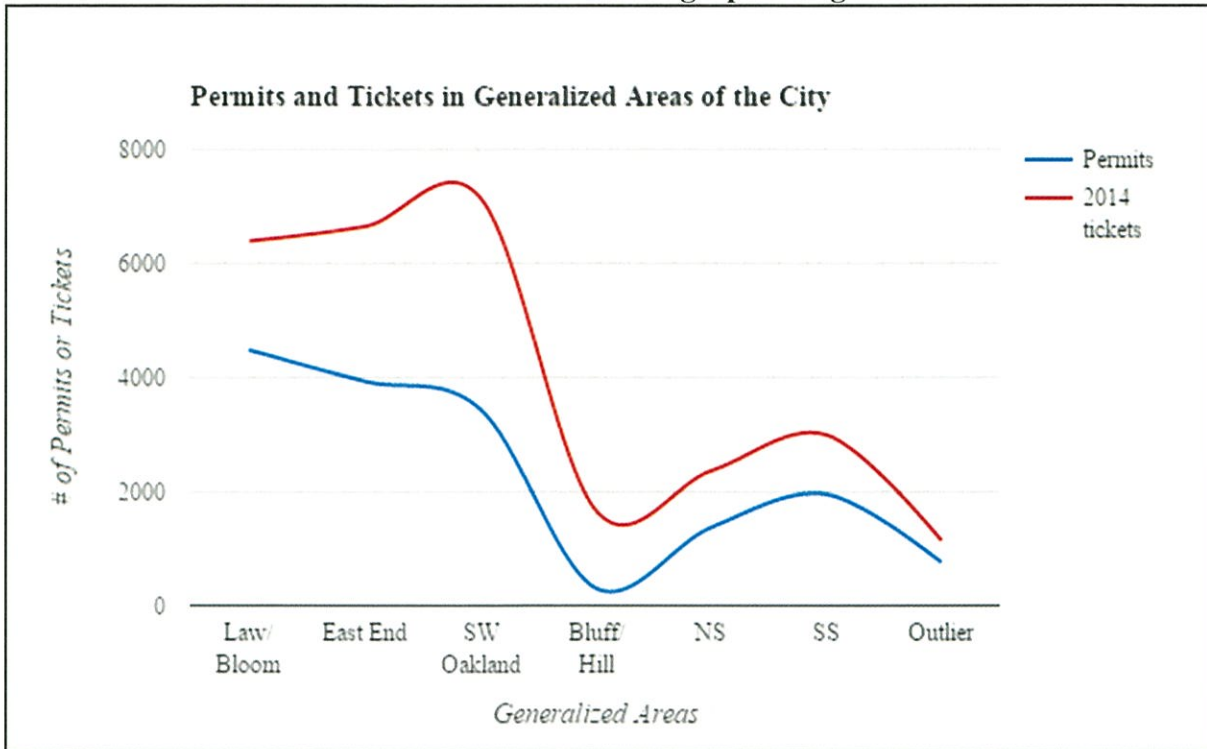
Source: Pittsburgh Parking Authority

Finding: The numbers of tickets issued were proportional to the amount of permits in an area, indicating that the general geographic enforcement by the PEOs was equivalent across the City.

Finding: The City-wide ratio of tickets issued to permits issued is 1.75 (28,360 tickets/16,213 permits). The regional ratios were 1.79 for the East, 1.55 in the South and 1.73 for the North.

The RPPP areas were then categorized into more generalized areas to examine the enforcement rate as indicated by tickets issued. The groups were as follows: Lawrenceville/Bloomfield (A, BB, H, I, R), East End (FF, J, K, Q, S, U, V, X, Y, Z), Southwest Oakland (B, C, D, E, M), Bluff/Hill District (P, W), North Side (F, G, HH, L), South Side (CC, DD), and Outliers (DD, EE, N, O, T).

CHART 4
Permit/Ticket Ratio for RPPP Geographic Regions 2014



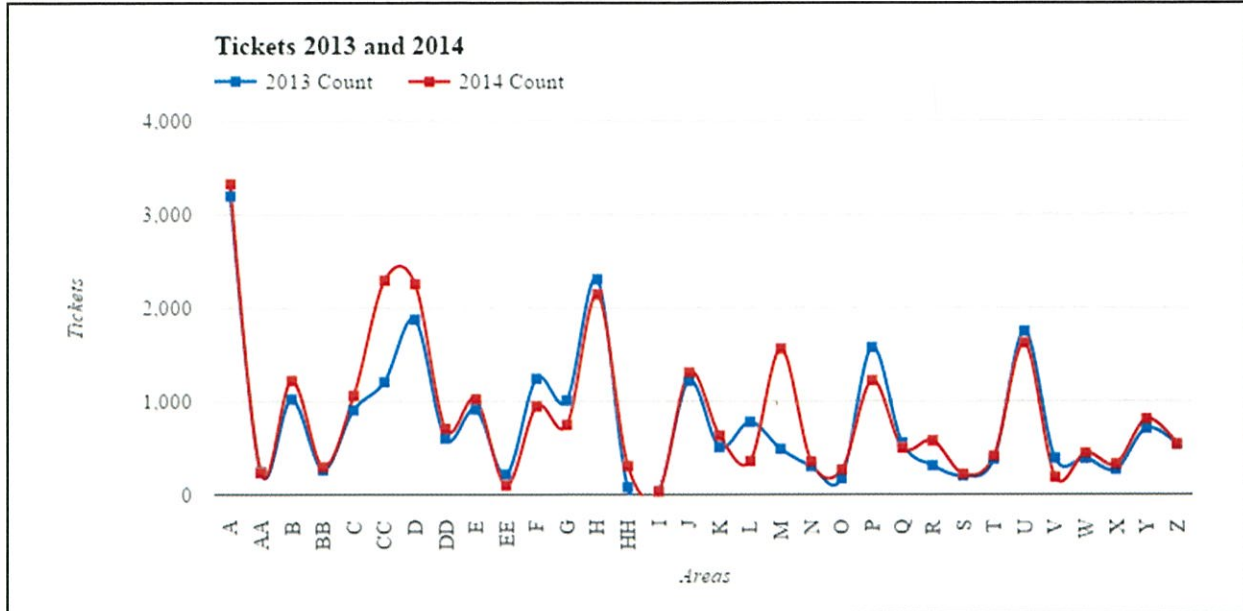
Source: Pittsburgh Parking Authority

While the PEOs are principally charged with enforcing metered spaces and can only allocate a certain amount per day to monitor RPP violations. However, they do appear to service the RPPP areas roughly equally when looking at the distribution of permits per area. The ratio of tickets issued to parking permits ranged from 1.4 to 2.0 for all areas except for Bluff/Hill, which had 5.5 tickets issued per resident permit. The ratios, except for the Bluff/Hill zone, fall within +/- 20% of the City-wide ticketing ratio of 1.75.

Finding: Enforcement of all RPPP areas is roughly proportional to the number of permits issued in the area.

In the years 2013 and 2014, eight (8) of the RPPP areas in Oakland, Bloomfield, Lawrenceville, Shadyside and Uptown (A, C, D, F, H, J, P, U) represented 56% and 55% of total tickets issued. Four of those areas (A, D, H and U) also have the largest number of streets and spaces within their boundaries, accounting for one third of the spaces under RPPP.

CHART 5
RPPP Tickets Issued By Area 2013-14



Source: Pittsburgh Parking Authority

Finding: More tickets are issued in the RPPP areas of Oakland, Bloomfield, Lawrenceville, Shadyside and Uptown.

This was in agreement with the previous 2013 audit. In 2011, the same eight RPPP areas accounted for 57% of all tickets issued. In 2012, those RPPP areas accounted for 54% of all tickets issued in RPPP districts.

General Enforcement Issues

Currently, the PPA enforcement division has 35 Parking Enforcement Officers (PEOs) on duty, with only 17 being full-time employees. Even with upcoming technological improvements in their enforcement tools, the limited manpower makes enforcement of RPPP districts less of a priority than patrolling high-traffic corridors.

Anecdotally, the auditors were told of unpermitted cars that park regularly in RPPP areas, residents and mid-year renters who have never applied for a parking permit and local employees who park during the work day without suffering any consequences. The auditors have no way to test the extent of RPPP “scofflaws”, but their presence has been reported by multiple sources representing multiple Residential Parking Permit Program areas.

The recertification surveys taken by DCP indicate that RPPP participants report a 42.4% dissatisfaction rate with their area’s enforcement.

Finding: Due to manpower limitations, the PPA does not patrol all RPPP areas on a routine basis, often responding reactively to resident complaints rather than on a proactive basis.

RECOMMENDATION NO. 30:

While the Parking Authority's PEO roster is necessarily based on budgetary considerations, in lieu of increasing the PEO force, it could consider operating RPPP neighborhood "sweeps" where staff is committed to one neighborhood over a brief period of days to enforce Residential Parking regulations.



July 29, 2016

Michael E. Lamb, City Controller
City of Pittsburgh
414 Grant Street
Pittsburgh, PA 15219

Dear Controller Lamb:

The Department of City Planning has received the Controller's Office's performance audit of the Residential Parking Permit Program. Our proposed changes to the audit have been incorporated into the audit, and we have the following response:

- In reviewing the audit, we have determined that recommendations #1-14 and 24-29 are related to City Planning's role in the administration of the RPP Program. We believe that other recommendations in the audit are related to the Pittsburgh Parking Authority's responsibility to permit and enforce the RPP Program.
- Of these recommendations, the Department of City Planning is pleased to report that we are already implementing recommendations #1, 3, and 4 and are in the process of implementing recommendations #7, 8, 12, and 13.
- In addition to the recommendations already being implemented, the Department of City Planning has been working with the Parking Authority and City Council to present legislation to amend the City Code to implement recommendations #5, 10, 14, and 26-28. We look forward to completing those amendments to the City Code in 2016, and are hoping that work will allow the Parking Authority to automate their permitting system (Recommendation #16) while providing the benefits outlined in the audit.
- Although the Department concurs with the audit's findings that led to recommendations #2, 6, 9, 11, 24, 25, and 29, we will need more time to evaluate what actions would be needed to implement those recommendations and how to continue to balance residential parking demands with that of other uses in our administration of the Program.

In addition, the Department has been looking at best practice cities across the country to make improvements to the RPP Program to make it a more rounded and helpful tool to combat parking issues within residential areas of the City. This performance audit will assist in our efforts for improvement and will be used as a catalyst in moving that work forward.

Thank you for the collaborative nature of this performance audit, and feel free to contact me or my staff with any follow-up that is needed.

Sincerely,

Raymond W. Gastil, AICP
Director of City Planning



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July 28, 2016

The Honorable Michael Lamb
City Controller
Office of the City Controller
414 Grant Street
Pittsburgh, PA. 15219

Dear Mr. Lamb:

On June 23, 2016, I met with Gloria Novak and Julie Hall to review your recent performance audit of the Public Parking Authority of Pittsburgh's Residential Parking Permit Program. This letter will serve as our response to the audit report. It is important at the outset to note the scope of the audit, as stated on page 3 of the report:

"The scope of the Residential Parking Permit Program audit examined program activities and process from January 2013 to August 2015".

As a general matter, we are pleased that overall, the audit was favorable and showed that the Authority is in compliance in most instances. We also appreciated the recommendations made, and will work to implement the majority of them when feasible.

Recommendations No. 1 through 14: No action is required by the Public Parking Authority of Pittsburgh as the findings and recommendations fall under the purview of either the Department of City Planning, Pittsburgh City Council or the Port Authority of Allegheny County.

Recommendation No. 15: The Authority will re-evaluate the two part-time RPPP customer service positions during the 2017 budget process. The Authority does not concur with the statement / findings that these two positions require specialized knowledge; rather they are consider administrative clerk positions, providing customer service.

Recommendation No. 16: The on-line RPPP registration and virtual permit initiative has been in the Authority's pipeline since 2015 and will be up and running as an alternative to the walk in option by the end of fiscal year 2016. Please note that the on line registration is only for the permit and not available

for the visitors pass as this change requires City Council approval, which the Authority has attempted to receive, unsuccessfully several times.

Recommendation No. 17: The Authority is in agreement with this recommendation “of denying a permit because of outstanding tickets” and will make the recommendation to Pittsburgh City Council to amend, City Code 549.

Recommendation No 18: This recommendation to increase a vehicles weight to 7,500 pound is outside the Parking Authority’s purview and would require action from either the Department of City Planning or City Council.

Recommendation No.19: The Authority was glad to see that the report recommended a rate increase for the visitor pass. This is a recommendation the Authority made to City Council when the RPPP permit was increased to \$20.00 and the visitors pass remained at \$1.00. The Authority at that time, recommended \$30.00 for the permits and \$10.00 for the visitors pass. The Authority continues to work with City Planning and other City agencies to improve the efficiency of the RPPP program.

Recommendation No. 20: The Authority agrees with the flat rate fee for RPPP permits and currently does not prorate for under 12 months.

Recommendation No. 21: The Authority currently records whether the resident is a student or non-student status. In order to reduce costs associated with returned mail that lacks any forwarding address therein; renewals are not sent to students whose residency changes from year to year the majority of the time.

Recommendation No. 22: This recommendation as noted does not fall under the Authority’s purview, therefore no action can be taken by the Authority.

Recommendation No. 23: The Authority does not concur with this recommendation, because our enforcement staff utilizes hardware and software, which are currently state of art technology and Pittsburgh is consider one of the industry leaders across the country in that respect.

Recommendation No. 24: The cost of the Visitor pass does not fall under the Parking Authority purview but we do agree with the increase cost recommendation, which the Authority has suggested to the City.

Recommendation No. 25: Recommendation again not under the Parking Authority’s purview, it’s a policy issue.

Recommendation No. 26: Recommendation again not under the Parking Authority’s purview, it’s a policy issue.

Recommendation No. 27: Recommendation again not under the Parking Authority's purview, it's a policy issue.

Recommendation No. 28: Recommendation again not under the Parking Authority's purview, it's a policy issue.

Recommendation No. 29: Recommendation again not under the Parking Authority's purview, it's a policy issue.

Recommendation No. 30: There are many factors that are evaluated when determining the staffing levels of Parking Enforcement Officers and the budgetary consideration is one of them. Our enforcement schedules are a living document and RPP enforcement is just one part of the scheduling along with meter, street cleaning and lot enforcement. The Authority evaluates the total scenario when developing the enforcement schedule. Also, while staffing is a key component to enforcement we also take into account the many different events that occur throughout the City during any one fiscal year.

Finally, I want to thank you and your staff for conducting this Performance Audit in a professional manner and for the efforts your auditors took to fully understand the many nuances and complexities associated with the Residential Permit Parking Program as legally defined and implemented by the City Planning Department, certified by City Council and administered by the Public Parking Authority of Pittsburgh.

Sincerely,



David Onorato, CAPP
Executive Director

cc: Gloria Novak, Controllers Office
PPAP Board of Directors