

Department on Disability & Department of Transportation

**Los Angeles Accessible Parking Policy
Advisory Committee:
Recommendations and Summary
Report**

June 2017



Los Angeles Accessible Parking Policy Advisory Committee
Summary Report

Executive Summary

Parking can be a challenge in Los Angeles, as in many cities, but is particularly challenging for people with disabilities. Current disabled parking placard and accessible parking policies are failing to increase access for people with disabilities. In addition, the current policies are reducing parking availability for all drivers. While the problem is often raised by many groups, finding a mutually acceptable solution has been more challenging.

In summer 2016, a Los Angeles committee on Accessible Parking was formed at the request of Mayor Garcetti. This stakeholder group was comprised of disability rights advocates, transportation experts, and other stakeholder representatives. The group was charged with better understanding the complex issues around accessible parking, and coming up with a series of recommended solutions. The group met for nearly nine months, arriving at a package of policy recommendations to increase access to street parking for disabled drivers and reducing parking placard misuse.

The recommendations package included the following components:

1. Marketing campaign focused on implications of misusing placards
2. Clarify placard certifiers
3. Two-tiered pricing system
4. Longer time limits at blue zones
5. Direct revenue from two-tier system to be used for accessibility improvements
6. Increase the number of blue zones to at least 4 percent of metered spaces
7. Increase the number of accessible spaces in off-street facilities
8. Create/install accessible parking meters and/or other accessible technology payment options
9. Increase citation amount for accessible parking violations
10. Improve on-street enforcement

These recommendations will now be shared with additional stakeholder groups and city officials to better understand and implement the findings and recommendations. The recommendations include directives for both city and state policy and operational changes, implying a multi-level implementation strategy.

Committee Process

At the request of Mayor Eric Garcetti, the Los Angeles Department of Transportation (LADOT) convened the Accessible Parking Policy Advisory Committee to review and make policy recommendations for improving on-street parking accessibility for people with disabilities. The stakeholder group first convened in July 2016 and is comprised of 14 members. These members include disability rights advocates, many of whom use disabled parking placards, as well as transportation and community representatives. From July 2016 to March 2017, the committee met five times and was co-chaired by Stephen Simon, Executive Director of the Los Angeles Department on Disability, and Seleta Reynolds, General Manager of the Los Angeles Department of Transportation. In addition, a subset of the committee met three times to facilitate in-depth discussion, recommend items for discussion by the full committee, and provide input on research, analysis and materials for meetings.

Committee Members

Co-chairs

Seleta Reynolds – General Manager of Los Angeles Department of Transportation

Stephen Simon -- Director of Los Angeles Department on Disability

Members

Frank Ching – Director of Parking Management, Los Angeles County Metro

Andrew Conway – Chief of Registration Policy and Automation, California Department of Motor Vehicles

Diego de la Garza, Margaret Wynne, Chung Leong – Office of the Mayor (rotating seat)

June Kailes – Independent consultant specializing in disability and access matters

Chad Lynn – representing the California Public Parking Association

Sam Overton – President of the LAWA ADA Committee

Andrew Thomas – Westwood Business Improvement District

Seyed Torabzadeh – Chairperson for the Caltrans ADA Committee

Dr. Fernando Torres-Gil; Professor of Social Welfare and Disabled and Director of Policy Research on Aging

David Wolf – Los Angeles City Disability Commissioner

Theresa DeVera – Los Angeles City Disability Commissioner

David Geffen – independent mediator and lawyer specializing in disability and access matters

Dr. Jeffrey Lee – representing Los Angeles County Medical Association

Committee Support

Staff: Jay Kim, Ken Husting Peer Ghent, Greg Savelli – Los Angeles Department of Transportation

Facilitators: Richard Weiner, Lauren Mattern, Carmen Chen – Nelson\Nygaard Consulting Associates

Purpose, goals, and approach

The Committee was charged with the following tasks:

- Deliberate carefully about whether there is a problem with accessible parking in Los Angeles.
- Seek consensus that there is a problem and define the parameters of the problem.
- Establish goals and criteria for potential solutions to the problem.
- Consider various policy options to solve the problem(s).
- Develop broad agreement over selected policy options.
- Propose a solution and evaluation criteria for ensuring that the problem is solved, while also identifying strongly dissenting viewpoints.

A Subcommittee was formed, intended to be a smaller group that can do a “deep dive” on details and report back to the broader Committee. The purpose of the Subcommittee was to bring recommendations to the full Committee for their broader consideration, but the full Committee was responsible for all final votes.

Committee and Subcommittee Meeting Schedule

Meeting Type and Number	Date	Purpose
Full Committee Meeting #1	July 15, 2016	<ul style="list-style-type: none"> - Introduce the Committee and process - Begin conversation about defining the problem
Full Committee Meeting #2	October 27, 2016	<ul style="list-style-type: none"> - Critical mass of support on problem definition - Exploration of roots of the problem(s)
Subcommittee Meeting #1	November 10, 2016	<ul style="list-style-type: none"> - Deepen understanding of roots of the problem(s) - Gather information requests regarding both roots of the problems and policy ideas
Full Committee	December 6,	<ul style="list-style-type: none"> - Exploration of background material, and

Meeting #3	2016	<p>roots of the problem(s)</p> <ul style="list-style-type: none"> - Critical mass of support on roots of the problem(s)
Subcommittee Meeting #2	December 12, 2016	<ul style="list-style-type: none"> - Explore and engage with case studies and background research - Begin to discuss types of solutions
Full Committee Meeting #4	February 6, 2017	<ul style="list-style-type: none"> - Continue conversation about best practices that began in Subcommittee meeting - Determine criteria for making decisions
Subcommittee Meeting #3	February 28, 2017	<ul style="list-style-type: none"> - Apply effectiveness and feasibility criteria to the proposed list of policy options - Develop a draft list of prioritized policy recommendations for consideration by the full committee
Full Committee Meeting #5	March 15, 2017	<ul style="list-style-type: none"> - Discussion of and voting on policy options - Arrive at preferred policy package
Full Committee #6	April 18, 2017	<ul style="list-style-type: none"> - Final voting on policy package - Determine steps to share and implement recommendations

Defining the Problem

The Committee first discussed their experience and knowledge of accessible parking options and general parking system, and agreed there is a problem to be solved.

After reaching consensus that there are problems with accessible parking and placard misuse in Los Angeles, the committee's first task was to define the problems occurring with respect to accessible parking and identify the roots of those problems. The Committee voted on the problem statement and defined the problem to include the following:

1. People with disabilities can't find parking
2. There is not enough parking turnover
3. There are environmental impacts due to increased congestion caused by lack of parking turnover
4. There is not enough blue zone parking

The committee also identified roots of these problems, such as the financial incentive for misuse and limited checks and balances to ensure placards are limited to those who need them. Following a similar pattern to most of the Committee's work, the group brainstormed potential roots, reviewed background information, and then voted to identify the key roots of the problem using the "gradations of agreement" process (described below). The full list of roots of the problem identified by the Committee include:

1. General parking availability (all types of spaces) is limited in some areas of the city.
2. There is not a sufficient amount of disabled, accessible parking.
3. There is not a sufficient amount of disabled van-accessible parking.
4. There is inadequate enforcement of people fraudulently obtaining placards (refers to enforcement of DMV issuance processes).
5. Current approach for enforcing on-street disabled parking placard violations is limited, challenging, and difficult to scale up effectively (refers to LADOT enforcement process).
6. Private businesses sometimes do not adequately provide and maintain the required amount of accessible parking spaces, pushing accessible parkers to find other parking options on the street.
7. There is incentive for fraudulent procurement and retention (i.e. placard validity not ending upon end of need) of disabled placards due to free or reduced rate parking.
8. There is incentive for fraudulent procurement and retention (i.e. issuance not ending upon end of need) due to convenience; defined as: lack of time limits, distance from destination, available parking spaces.
9. The DMV application and retention process is open to abuse by those who do not truly need the benefits of a permit.
10. The physician approval process is open to abuse.
11. Eligibility criteria for obtaining placards are too broadly defined.
12. There is increasing demand for placards in LA County.
13. There is abuse of legitimately issued placards by parties other than registrants themselves.

Background Research

The Committee reviewed background information from a variety of sources to better understand the problems, opportunities, and case studies related to accessible parking policies and the Los Angeles parking system. The background review included:

- Demographics and disability statistics
- Statute/regulations, including Vehicle Code Section 22511.55 that allows for free parking for disabled placard holders

- Disabled placard issuance data
- DMV issuance and process, including for revoking permits
- Parking system programs and operations, including LA Express Park and turnover issues observed in pilot areas
- Review of the current blue zone program
- Disabled placard enforcement protocol, strategy, fines, and results as well as the perspective of parking enforcement officers
- DMV issuance and process
- Medical professional experience on DMV application form and general approval
- Best Practices and case studies, including
 - San Francisco: SFpark recommendations and analysis of best practices in other jurisdictions
 - Two Tier Solution: how it works, academic publications, and examples from Illinois, Michigan, and Portland, Oregon.
 - New York City's accessible parking certification program
 - On-Street Citizen Enforcement programs
 - Online Enforcement tools

City staff shared available data on the functioning of the placard program in Los Angeles. Key highlights included:

- Parkers with some type of parking placard account for over 40 percent of the occupied time in Downtown and Westwood Village. The median parking duration for non-paying parkers is 7.4 hours, compared to 1.8 hours for parkers who pay. The high rate of nonpayment limits the effectiveness of City efforts to improve the parking system, such as LA Express Park, which aims to improve parking availability and reduce congestion and pollution by using demand-based parking pricing and real-time parking guidance.
- In Los Angeles County, about 7.4% of the population has disabled parking placards, around 740,000 placards.
- The City's parking enforcement group dramatically ramped up enforcement stings in 2016, more than three-fold, with limited impact on the overall percent of offenders. Enforcement protocol for accessible parking violations are time- and people-intensive, limiting the potential of enforcement-based solutions. Over 17,000 total accessible parking violations were issued in Fiscal Year 2016.
- The blue curb program has been limited in recent years, with very few blue zones currently existing in metered areas. The City has been formulating plans to expand and relaunch the program. The current lack of parking availability in high demand metered zones will severely limit the effectiveness of new blue curb zones in the absence of additional policy changes.

Effectiveness and Feasibility Criteria

Based on the exploration of the problem, the Committee then developed the following criteria to guide their selection of possible policy solutions:

- Easier for people with disabilities to find parking in blue zones and in general metered spaces
- Reduced placard misuse
- Recognition of diverse needs/requirements of the disability community
- Approval feasibility
- Ease of user interface
- Implementation and operational feasibility
- Financial feasibility
- Time needed for approval and implementation

The consideration of specific metrics associated with the effectiveness criteria helped guide the analysis of an array of policy options with the goal of making concrete improvements to the accessible parking system as the key goal:

<i>Effectiveness Criteria</i>	<i>Measure</i>
Makes it easier for persons with disabilities to find parking in blue zones	<ul style="list-style-type: none"> • Change in the number and availability of blue zones
Makes it easier for people, especially those with disabilities, to find parking in general metered spaces	<ul style="list-style-type: none"> • Change in parking availability at general metered on-street parking spaces
Reduces placard misuse	<ul style="list-style-type: none"> • Expected change in placard misuse
Recognizes diverse needs/requirements of the disability community	<ul style="list-style-type: none"> • Whether or not policy is suitable for persons with disabilities who are low income vs. not low income, and for different types of mobility impairments, or adaptive devices (including vans)

<i>Feasibility Criteria</i>	<i>Measure</i>
Approval feasibility	<ul style="list-style-type: none"> • Policy/legal change requirements • Likelihood of support • Ease of explanation to policymakers • Whether it meets ADA requirements
Ease of user interface	<ul style="list-style-type: none"> • Whether policy is easy to understand
Implementation and operational feasibility	<ul style="list-style-type: none"> • Capability (ability, resources, technology) of relevant agency/agencies to implement and operate solution • Feasibility in other California jurisdictions
Financial feasibility	<ul style="list-style-type: none"> • Fiscal impact to City and State
Time needed to get new policy approved and implemented	<ul style="list-style-type: none"> • Anticipated year of implementation

Policy Option Evaluation

During its nine months of work, the Committee reviewed many approaches to address the problems identified, drawing on best practices and case studies across North America, as well as parking policy research. After defining the problem, establishing criteria, and reviewing research, the Committee identified a list of policy options for evaluation. The steering committee and full committee discussed the list, voting on each item and discussing synergies. The Committee found that no single policy could successfully create parking access for people with disabilities, and that a multifaceted approach would best address the nature of problems identified. For instance, it became clear that no city had successful increased access and reduced placard misuse using enforcement or citation tactics alone. Using the effectiveness and feasibility criteria as a guide, the group proposed and analyzed over twenty policy options relating to parking pricing, enforcement, time limits, placard certification, eligibility criteria, parking technology, citations, and public awareness.

Policy Options Considered

#	Option	Description
1	Increase the number of blue zones to 4% of metered spaces	Would add to the number of existing blue zones to meet 4% standard
2	Place one blue zone per metered blockface	Would require the additional allocation of blue zone places to ensure there is one per metered blockface
3	Clarify placard certifiers	Would limit approval for placard to physicians, surgeons, or

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#	Option	Description
		optometrists only and remove other medical professionals from the list
4	Clarify placard eligibility requirements	Would remove “disease or disorder which substantially impairs or interferes with mobility” and replace it with a more specific description such as “cannot walk 200 feet without stopping to rest” ¹ or “uses portable oxygen” ² or any other very specific mobility issue criteria
5	All permanent placards approved by a state-certified doctor	During a 6-month temporary placard period, in which an applicant was approved through the existing application process, the applicant would have an in person evaluation with a state-certified doctor to verify condition. Once verified the applicant would receive a permanent placard
6	Applicant review system similar to paratransit	In addition to the application, this process would require a phone or in-person (pending the application content) eligibility evaluation
7	State database overhaul and certifier verification program	Would require the State to implement a database based on the regional discount card program to collect information about placard applicants and certifying professionals, including the certifiers’ signatures
8	Direct revenue from metered blue zones used for accessibility improvements	Would designate an equivalent amount of revenue received at metered blue zones for accessibility improvements
9	Four-hour meter time limits for placard holders (unless posted time limit is longer)	Extends a metered parking space time limit to 4 hours (unless already longer) to provide extra time for people with disabilities to carry out their activities
11	All placard holders pay regular rate parking meters	Removes parking payment exemption from placard holders, thus eliminating the financial incentive that leads to fraud
12	Placard holders pay at meters except for those who physically cannot pay	Variation of policy above, with a parking fee exemption for only those who meet specific physical qualifications
13	Placard holders pay a discounted rate at all meters	Requires all placard holders to still pay parking fees, however fees would be at a discounted rate
14	Discounted rate in metered blue zones	Placard holders would be responsible for metered rates, unless parked in a blue zone, where the rate would be discounted

¹ Pennsylvania, Virginia, New York, Illinois, and Arizona placard applications

² Pennsylvania, Virginia, New York, Colorado, Illinois, Missouri, and Arizona placard applications

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#	Option	Description
15	Low income placard holders pay a discounted rate at meters	All placard holders would pay parking fees, except those that qualify as low income. Low income placard holders would pay a discounted rate
16	Improve on-street enforcement	Add to the existing enforcement program for placard abuse, including increased stings, placard enforcement outreach, add photos to the placards, and begin a volunteer program
17	Conduct enforcement on those who certify placards	Police officers would target offices that certify placards to determine if they are doing so in violation of the law
18	Two Tiered System: Wheelchair and Non-Wheelchair permit types	Wheelchair Parking Placard: exempt from parking fees at any space marked for 30 minutes or longer Disabled Person Parking Placard: not exempt from parking fees at one to two hour spaces- however an extra three hours of parking is allowed free of charge
19	Two Tiered System: Placard types based on severity of disability and limited mobility	Meter Exempt Placard: Issued to applicants with a disability that prevents them from access or operating a parking meter or ticket machine Non-Meter Exempt Placard: Issued to applicants with a disability, however the disability does not impair their ability to operate a parking meter or ticket machine, therefore placard holders are not exempt from parking fees
20	Citizen Enforcement System- In person patrol	Volunteer citizens assist with the reporting of disabled parking placard abuse
21	Citizen Enforcement System- On line reporting system	On line portal where citizens can submit a report on disabled parking placard abuse
22	Poster and video campaign	Campaign aimed at highlighting the justifications people use to deny others access to accessible spaces by committing disabled parking placard fraud
23	Create/install accessible parking meters – creation of accessible technology to process payment	Creation of accessible parking meters that are operable by persons with disabilities- unable to operate a standard meter

The Committee used the Gradations of Agreement approach to determine which policy options had the greatest support. The Gradations of Agreement Voting System allowed members to express the range of their opinions on policy options:

- 1. Strongly endorse**
- 2. Support with reservations**

3. On the fence
4. Have significant concerns
5. I would block if I could

The recommendations that gained the highest votes were combined into a single package, and the full Committee then took final vote on recommendation details to create a cohesive package.

Recommendations Package

The package of recommendations agreed upon at the final Committee meeting, a culmination of their consideration of the issue. Elements include:

Marketing campaign

A marketing campaign would aim to increase public awareness of the implications of misusing placards. It could highlight the ways that placard misuse denies access to people who really need it. The campaign should be data-driven, reflecting the types of misuse that are most common. Successful programs in other cities have involved poster and video campaigns.

Clarify placard certifiers

The DMV relies on medical professionals to certify that individuals are qualified to receive disabled parking placards or license plates. This policy would seek to reduce the number of placards that are provided to people who do not qualify for them by limiting the number of professionals that can approve placards. This strategy would limit approval of placards to physicians, surgeons, and optometrists, and remove other medical professions from the list. The current list of approvers includes physician assistants, nurse practitioners, certified midwives, and licensed chiropractors. Streamlining the number of professionals who can issue the placards may also help simplify coordination and communication channels between the state and local officials regarding issuance standards, with the broader goal of confirming that medical professionals are responsible for appropriately discerning eligibility for placards.

Two-Tiered System

A two-tier system takes different levels of disability into account:

- Tier One: Persons with disabilities that severely limit their mobility are exempt from time limits (including at short-term meters) and payment.
- Tier Two: Those who have less severe disabilities are subject to time limits and payment.

Establishing a two-tiered system involves eligibility categorization. The Committee voted to adopt eligibility criteria similar to those used by the State of Illinois. One caveat was included: while the State of Illinois limits placard issuance to the drivers with a valid driver's license themselves, the Committee did

not wish to limit the California placard issuance policy in that way, preferring no such restriction.

Illinois Tier 1 placard holder criteria include “a person with a disability must... be unable to do at least one of the following:

- Manage, manipulate or insert coins, or obtain tickets or tokens in parking meters or ticket machines in parking lots or parking structures, due to the lack of fine motor control of BOTH hands;
- Reach above his/her head to a height of 42 inches from the ground, due to a lack of finger, hand or upper-extremity strength or mobility;
- Approach a parking meter due to a wheelchair or other device for mobility; or
- Walk more than 20 feet due to an orthopedic, neurological, cardiovascular or lung condition in which the degree of debilitation is so severe that it almost completely impedes the ability to walk.”

Longer time limits at blue zones

Implementation of this package of recommendations involves creating new blue zones and requiring payment for the Tier 2 placard holders at blue zones. The Committee voted in favor of having longer time limits at blue zone spaces, with municipalities determining the exact preferred time limits at these spaces. This will ensure that a subset of the parking supply has extended time limits for those who need to park for longer periods.

Direct revenue from two-tier system to be used for accessibility improvements

This strategy designates parking revenue from a two-tiered system towards improvements to accessibility of the parking system or broader transportation system. This includes revenue from blue zones, but also the broader two-tiered payment system when it is implemented. This strategy is complementary to the payment policy. Any funds resulting from the two-tiered policy would be set aside to fund continuing improvements and expansion of more blue zones, building ramps, and other improvements designed to make the city’s parking and transportation system increasingly accessible over time. The intent is to commit a stable, dedicated funding source to improving transportation accessibility citywide. This funding stream would be available when a two-tiered parking system is approved and implemented at the state level.

Increase the number of blue zones to at least 4% of metered spaces

This strategy would increase the number of existing blue zones to meet the 4% standard or higher if accessible parking professional guidelines increase that percent in future years. If misuse is reduced via other policy items in this package, most notably pricing, this change will make it easier for persons with disabilities to find parking in blue zones. This policy should include language

giving guidance that the policy ensure even distribution of the blue zones, but without unreasonable mandates (e.g., one on every blockface or one every 25 metered space). Funding for these improvements can be tied to increased revenue from decreasing placard misuse.

This policy was primarily discussed in local terms – i.e., a commitment the City would make as part of a multi-dimensional package. However, it is also the recommendation of the Committee that this be considered for statewide policy consideration, complementary to the two-tiered solution.

Increase the number of accessible spaces in off-street facilities

Most of the Committee's recommendations focused on the on street parking system. However, Committee members noted that the percent of the population of people with disabilities has grown significantly, and the percent of parking spaces in off-street facilities should be increased to reflect that growing population.

Create/install accessible parking meters and/or other accessible technology payment options

This strategy calls for the adoption of accessible parking meters that are operable by persons with disabilities who are unable to operate a standard parking meter. This could have broader implications but meter height and meter head angle are initial considerations. Pay-by-phone apps and other potential payment tools may also increase accessibility of payment processes. This strategy is complementary to the introduction of pricing for some placard holders.

Increase citation amount for accessible parking violation

Citations for accessible parking violations (inappropriately parking in a blue zone) are \$363 in Los Angeles. This compares to \$445 in Sacramento and \$875 in San Francisco. Considering that citations are comparatively low, increasing the amount may help curb abuse, or at least better reflect the seriousness of the violation. The Committee acknowledges that citation amount is limited in its ability to reduce violations, and this strategy is considered complementary to other measures that more significantly address misuse on a broader scale. The Committee did not wish to have the fine be too high, because, although a serious fine is appropriate in some ways, if it reaches a certain level then the likelihood of dismissal upon appeal increases. According to City ordinance³, the City can increase the fine by about \$100 fairly simply.

Improve on-street enforcement

This strategy involves adding to existing enforcement programs for placard abuse, including increased stings and enforcement outreach. The goal is to

³ CVC 4461.3

increase visibility of enforcement, rules, and repercussions of fraudulent use of placards.

Dissenting Options

The Committee process was consensus-driven, with most discussions and debates leading to consensus or near-consensus approval. There was a dissenting vote from one member regarding the two-tiered package. That member ultimately did not wish to change free parking provisions due to concern about income equity among the disabled population. Another member voted against the recommendation to limit the number of professionals who can issue placards. They noted that some patients prefer to visit nurse practitioners or other types of medical professionals for much of their medical care, and there is not sufficient evidence that certain types of professionals are more or less associated with inappropriate issuance of disabled parking placards.

Next Steps & Timeline

Beginning in June 2017, City Department on Disability and Department of Transportation staff will initiate further outreach, adoption, and implementation steps to advance the recommendations of the Committee.

Stakeholders

Specifically, the report will be shared with the City's Transportation Commission, Commission on Disability, Transportation Committee, City Council, as well as the California Public Parking Association. Presentation of the recommendations will be offered to disability advocacy organizations and transportation-focused organizations.

The package has recommendations specific to state law and programs. The state level recommendations include the two-tier system, establishing accessible parking provision rates, and revenue dedication requirements. These state level recommendations will be shared with relevant state legislators from the region.