



# City of Santa Barbara California

## PLANNING COMMISSION STAFF REPORT

**REPORT DATE:** July 9, 2015  
**AGENDA DATE:** July 16, 2015  
**PROJECT:** On-Street Valet Parking Ordinance  
**TO:** Planning Commission  
**FROM:** Public Works Department, (805) 564-5385  
 Rob Dayton, Principal Transportation Planner  
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### I. RECOMMENDATION

That the Planning Commission receive a staff report regarding on-street valet parking in Santa Barbara, and make a recommendation to the Ordinance Committee of the City Council (Council) to establish an ordinance regarding valet parking operations in Santa Barbara.

### II. BACKGROUND

The Santa Barbara Municipal Code is silent regarding valet operations in the public right of way. That means that valet operations are not specifically prohibited from happening on City streets. At the same time, City staff members do not have the authority to approve valet operations when requested.

This lack of policy and a supporting ordinance has created challenges in regulating and managing valet parking operations in Santa Barbara and safety and parking issues relating to valet operations.

#### Past Valet Requests

In November 1996, the City received a request from the Palace Café at 8 E. Cota Street for an on-street valet parking permit. The permit request was denied by a unanimous vote of the Council. Reasons cited include congestion/safety concerns, impacts to street parking and public parking lots, the ability to grant all valet requests (fairness), consistency with other City objectives, and staffing requirements.

#### Recent Developments

The Entrada hotel development on lower State Street is under construction. As part of the project approvals, the hotel will provide on-street valet parking services on East Mason Street. The hotel will also include a new parking garage. The upper levels of the garage will be dedicated to public parking, and the lower level will be used for valet parking storage associated with the on-street valet service on East Mason Street.

At numerous locations in downtown Santa Barbara, the Funk Zone, and on Coast Village Road, valet operators are operating on-street valet stands. These operations are typically in the evening,

are typically being operated for nearby restaurants, and are happening without the consent or oversight of the City. Some of the valet operations conducted in the public right of way are also using public parking supplies to store vehicles, either on-street or in a City-owned parking facility.

Staff recommends adopting an ordinance regulating on-street valet parking operations. Staff is not recommending the regulation of on-site valet parking.

### *Outreach*

In 2014, City staff began an outreach effort to determine the role of valet parking operations on City streets. City staff reached out to a number of business groups and City Committees, including:

- Greater Santa Barbara Lodging and Restaurant Association
- Downtown Organization
- Santa Barbara Chamber of Commerce
- Signature Parking
- Milpas Community Association
- Coast Village Road Association
- Transportation and Circulation Committee
- Downtown Parking Committee

The primary question that was asked to each group is whether or not valet parking should be allowed on City streets, and if so, whether or not valet parking operators should be allowed to utilize public parking supplies for vehicle storage. The feedback received was mixed. The organizations representing business groups generally felt that offering valet parking could benefit local businesses, and should be allowed. The City Committees were not as supportive. While some City Committee members could support on-street valet operations, no City Committee members support using the on-street and public parking supplies for vehicle storage. Some perceived a fairness issue because the Entrada development will include valet parking. During the outreach process, it was also pointed out that the Entrada development will include over 100 public parking spaces, which more than offsets the on-street spaces being utilized for valet drop-off and retrieval operations.

Another fairness issue that was noted in the process was that some businesses in Santa Barbara do not have street frontage that could accommodate valet parking (i.e. much of State Street).

### **III. DISCUSSION**

Approval from the Planning Commission is not required to establish a new ordinance addressing valet parking in Santa Barbara. However, the Planning Commission plays a valuable role in advising the City Council on land use compatibility issues. Staff's discussions with City Committees have been regarding mainly technical issues. On-street valet parking operations could alter the character of Santa Barbara and the "park once" policy currently governing Downtown parking. Staff is bringing this issue to the Planning Commission to receive comments and recommendations regarding on-street valet parking to take forward to the Ordinance Committee when they consider a new ordinance. Staff would appreciate the

Planning Commission's comments and recommendations as we draft an ordinance for presentation to the Ordinance Committee this fall.

*Potential Benefits of Valet Parking and a Regulated Valet Program*

*Use of Otherwise Empty Private Parking Lots*

Valet operators can enter into agreements with owners of private parking lots for vehicle storage. These parking lots may otherwise sit empty during certain times of the day. An example is a valet operator storing vehicles during evening hours at a nearby office building parking lot. By using these private parking lots, the overall supply of parking is increased.

*Maximize Utilization of Private Parking Lot Space*

Because valet operators have control of all the vehicles in the parking lot, they are able to stack vehicles more tightly than individual drivers. This also increases the supply of parking.

*Convenience to Customers*

By providing valet parking, businesses have the potential to attract more customers, helping these local businesses to be more successful. Disabled or elderly customers can benefit from not having to travel as far along the sidewalk system to reach their destination. Customers can count on being able to find convenient parking.

*Regulation*

By regulating valet parking, a number of observed issues can be better addressed, including:

- Vehicle storage location (i.e. storage in the public right of way or public parking lots, or in private parking lots)
- Double parking
- Parking in red/no parking zones
- Parking in bicycle lanes
- Multiple valet zones in close proximity
- Size/style and placement of valet stand and signs
- Driver behavior
- Scare off tactics (occupying parking spaces to keep them available for valet use)
- Public protection from unregulated/uninsured valet operators
- Adequate staffing to minimize on-street queuing

*Potential Impacts of Valet Parking*

*Santa Barbara Community Compatibility*

Valet parking somewhat diverges from the "park once" policy of operating Downtown parking. The park once strategy was developed to create parking efficiency, reduce

traffic and create a walking-oriented downtown where people walk by, and hopefully patronize, local businesses. Conversely, valet parking typically promotes a single business where people drive in and drive out. Although relatively small now, valet parking growth could begin to shift the culture of the Downtown over time with regard to how people access Downtown businesses. By using valet parking, people may avoid the experience of walking Downtown and engaging with people in the public realm and other business. Although people may disagree on whether this is a bad or good change from traditional Santa Barbara Downtown business access, it's important to consciously consider the possible outcomes.

Some Santa Barbara land use policies have been purposely tailored to discourage auto use. For example, the amount of parking spaces required within the central business district is intentionally less than parking demand to create a parking deficit. While the public parking district offsets the parking shortage, it is priced parking, which discourages employee use. This policy reduces traffic congestion and increases use of alternative transportation. Another example is the City's ordinance to prohibit drive-through businesses, which was done for air quality as well as traffic congestion reasons. Drive-through businesses can and do influence peoples trip decision making to favor driving to a certain location.

#### *Reduction of On-Street Parking Spaces*

Valet stands typically occupy one or two on-street parking spaces that could otherwise be used by the public. The argument can be made that if valet storage takes place in private parking lots, the overall quantity of parking increases.

Local valet operators have been observed storing vehicles on-street, which can reduce the amount of parking available for other nearby businesses and the public in general. Even if a valet ordinance is written to make this illegal, it will be challenging and costly for staff to inspect and enforce against this.

The argument can be made that the same people utilizing valets would occupy these on-street spaces anyway.

#### *Impacts on Downtown Parking Facilities*

Local valet operators have been observed utilizing Downtown Parking Facilities. One concern raised by Downtown Parking staff is the practice of ticket-switching. Santa Barbara's Downtown Parking facilities offer the first 75 minutes free of charge. Local valet operators have been caught switching tickets when entering and exiting the parking facilities to minimize parking charges.

The overall impact to parking supply is likely neutral, although individual parking facilities may be impacted depending on proximity to valet stands.

#### *Traffic Operations/Safety Concerns*

On-street valet stands have the potential to cause queuing into traffic lanes, which is a safety concern, particularly on busier streets. Also, by providing this service within the

public right of way adjacent to moving traffic, there is the potential for increased conflicts as opposed to these activities taking place on private property.

City Staff are not aware of any recent collisions involving valet operations.

Local valet operators have been observed double parking, parking in red-curb zones, and parking in bicycle lanes.

#### *Driver/Operator Behavior*

Valet operators typically aim to provide good customer service, which means parking and retrieving vehicles quickly, and possibly operating outside good pedestrian and driving skills. It should be noted that to date, Public Works is not aware of any incidents involving valet operators in Santa Barbara.

Valet operators have been observed employing scare-type tactics at certain valet stands in Santa Barbara by telling members of the public they are not allowed to use certain on street parking spaces. Staff is concerned about space within the public right of way becoming viewed as private.

The valet parking stands may project a feeling of exclusivity, and that not all members of the public are welcome.

#### *Fairness*

The Entrada hotel development is under construction near the intersection of State Street and Mason Street. As part of the project approvals, Entrada will operate valet parking on the 00 block of E. Mason Street, next to the hotel entrance. Vehicles will be stored in the hotel parking garage accessed from Helena Avenue. Included in the hotel parking garage will be over 100 parking spaces available to the public. So the number of parking spaces displaced by the valet stand is made up in the garage. Entrada's on-street valet parking operation may be perceived as unfair by other businesses.

Regardless of the outcome of this ordinance development process, the City is obligated to allow on-street valet parking for the Entrada project.

#### *Management of an On-Street Valet Parking Program*

Some of the issues mentioned above can be addressed through regulation, such as providing an adequately sized valet stand and staffing levels to minimize on-street queuing. Staff is concerned that establishing a permitting system for on-street valet parking will require routine inspections and potentially enforcement, which will require additional City staff time to perform these tasks.

Even with additional staffing, inspections would likely be periodic, leaving the potential for undesirable activities between inspections, and the need enforcement.

#### IV. COASTAL ZONE

Planning staff have indicated that any approved valet parking operation in the Coastal Zone will require a Coastal Development Permit.

The Coastal Commission staff is aware of and concerned about valet parking in the Funk Zone. On-street and off-street valet operations have occurred in the Funk Zone, as well as on Coast Village Road. Both types of valet operations have resulted in the valet operator's use of public parking supplies to store vehicles. Coastal Commission staff believes this practice to be inconsistent with the Local Coastal Plan because restaurant operators are using public parking for private interests.

#### V. ALTERNATIVES AND RECOMMENDATION

##### *A. Prohibit On-Street Valet Parking Except for Special Events*

One alternative is the prohibition of on-street valet parking operations, except for special events and adjacent to Entrada. In addition to larger special events that may request on-street valet parking, valet can be useful for private parties in residential areas.

This alternative would go against the feedback received from local business groups.

This alternative would address concerns about allowing on-street valet parking, including:

- Community compatibility,
- Reduction of on-street parking supplies,
- Traffic safety concerns,
- Valet operator behavior,
- City management of an on-street valet parking program.

##### *B. Prohibit On-Street Valet Parking With No Provision For Special Events*

Similar to alternative A, without a provision for accommodating special events.

##### *C. Establish A Valet Parking Program*

Another alternative is to develop a valet parking program to regulate on-street valet parking in Santa Barbara. This alternative would include a permitting or licensing system, and would place operational requirements on valet operators. Such requirements would likely include:

- Insurance requirements
- Relationship requirements and concurrence from neighboring businesses
- Vehicle storage requirements
- Valet stand and valet signs size and placement requirements
- Minimum spacing for valet stands
- Accommodating other passenger loading within valet zones
- Rate restrictions
- Adequate staffing to prevent on street queuing.

Staff would also develop a fee structure that would include compensation for periodic inspections and enforcement, and an enforcement strategy for non-compliant operations (e.g. monetary penalties or revocation of permit).

*D. Establish A Universal Valet Service*

Another alternative is to establish a universal valet service, similar to that in Downtown Pasadena. With this alternative, a single valet operator would operate multiple valet stands in business districts, and be accountable directly to the City. Other valet operations would be prohibited. Patrons could drop their vehicles off at one valet stand, and arrange to have their vehicle picked up at a different stand. The positive aspects of valet parking can be included in such a program, such as increased convenience to customers, and increased utilization of private parking lots.

This alternative could address some of the potential impacts associated with valet parking for an individual business, including:

- Conflicts with the “Park Once” policy. Because valet stands would be universal, as opposed to being associated with one specific business, there is less of a conflict with the City’s “Park Once” policy.
- Enforcing rules regarding utilizing on-street parking spaces, valet operator behavior, and safety can be more effectively be addressed if the operator is working for the City, and not for a private business.

The feasibility of this idea has not been explored. If directed, staff will look into further into this alternative.

**VI. NEXT STEPS**

The Planning Commission’s comments and recommendations will be forwarded to the Ordinance Committee. Staff anticipates presenting the Ordinance to the City Council for introduction this fall.