



STAFF REPORT INFORMATION ONLY

Toronto Police Service – Courtesy Envelope Pilot Program as Part of On-Street Meter Parking

Date:	October 31, 2007
To:	Planning and Growth Management Committee, City of Toronto
From:	Alok Mukherjee, Chair, Toronto Police Services Board

SUMMARY

The purpose of this report is to provide the Planning and Growth Management Committee with the Toronto Police Service's (TPS) response to its May 3, 2007 request that the TPS consider piloting a courtesy envelope program as part of the enforcement of on-street meter parking.

Financial Impact

There are no financial implications in regard to the receipt of this report.

ISSUE BACKGROUND

At its meeting held on September 20, 2007, the Toronto Police Services Board was in receipt of a report, dated June 29, 2007, from Chief of Police William Blair regarding a courtesy envelope pilot program as part of the enforcement of on-street meter parking.

COMMENTS

The Board received the Chief's report and agreed to forward a copy to the City of Toronto Planning and Growth Management Committee for information.

A copy of Board Minute No. P300/07, in the form attached as Appendix "A", regarding this matter is provided for information.

CONTACT

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SIGNATURE

Alok Mukherjee
Chair, Toronto Police Services Board

ATTACHMENT

Appendix A – Board Minute No. P300/07

A:city_rprt_meter_parking.doc

APPENDIX "A"

THIS IS AN EXTRACT FROM THE MINUTES OF THE PUBLIC MEETING OF THE TORONTO POLICE SERVICES BOARD HELD ON SEPTEMBER 20, 2007

#P300. COURTESY ENVELOPE PILOT PROGRAM AS PART OF THE ENFORCEMENT OF ON-STREET METER PARKING

The Board was in receipt of the following report June 29, 2007 from William Blair, Chief of Police:

Subject: COURTESY ENVELOPE PILOT PROGRAM AS PART OF THE
ENFORCEMENT OF ON-STREET METER PARKING

Recommendation:

It is recommended that:

- (1) the Board receive the following report for information; and
- (2) the Board forward a copy of this report to the City of Toronto Planning and Growth Management Committee for its consideration.

Financial Implications:

There are no financial implications relating to the recommendations contained within this report. However, in the event that a Courtesy Envelope Pilot Program is implemented, the costs associated with producing the envelopes could become the responsibility of the Toronto Police Service.

It should also be noted that a measurable decrease in net revenue to the City of Toronto would be anticipated if a Courtesy Envelope Pilot Program were implemented. The actual revenue impact of the pilot, and of the program if rolled out City-wide, cannot be determined at this time.

Background/Purpose:

At its meeting of May 3, 2007, the City of Toronto Planning and Growth Management Committee made the following request (Meeting No. 4, item PG4.6 refers) of the Toronto Police Services Board:

Decision Advice and Other Information:

The Planning and Growth Management Committee on May 3, 2007, requested the Police Services Board to consider piloting a "courtesy envelope" program with willing Business Improvement Areas for on-street meter parking, and report thereon to the Planning and Growth Management Committee as soon as possible.

Staff report for information on the On-Street Meter Parking

The above decision advice from the City of Toronto Planning and Growth Management Committee resulted from discussion during a recent meeting in which changes were recommended to on-street parking meter rates and increasing the maximum parking durations to better accommodate the needs of the citizens of Toronto. The committee was also in receipt of correspondence from the Downtown Yonge Business Improvement Area.

By way of clarification, a courtesy envelope is a private notice and envelope used by the Toronto Parking Authority at their unmanned, automated off-street parking facilities in an effort to collect outstanding fees due for parking at their locations. The envelopes are issued to vehicles which are parked at Toronto Parking Authority off-street parking facilities but are not displaying a valid proof of payment receipt. It is our understanding that the purpose of the courtesy envelope program is to provide the customer a second opportunity to pay the outstanding parking fee as an alternative to receiving a Parking Infraction Notice, under the City of Toronto bylaw. Since the courtesy envelopes are not issued in accordance with any bylaw, vehicles may not be towed.

Discussion:

The Toronto Police Service is proud of our ability to mediate issues of concern within all segments of the community. Equitable enforcement, fairness and consistency are central to the Toronto Police Service Parking Enforcement Unit's Core Values.

The purpose of paid permitted parking on City of Toronto streets is to ensure the availability of short-term parking. The most efficient and effective method of ensuring this situation exists is the continued official enforcement of paid parking regulations. There exists a strong possibility that voluntary compliance brought about by the implementation of a Courtesy Envelope Pilot Program would not match the current level of public compliance achieved with existing paid parking regulations. Failure to maintain the current public compliance levels would greatly diminish the availability of on-street parking in many areas of the city where necessary services are readily accessible.

The Parking Enforcement Unit has implemented several other measures across the city to promote a more customer-friendly, community oriented approach to the enforcement of parking regulations. These include extended time limits and an enforcement grace period. The decision advice from the City of Toronto Planning and Growth Management Committee was exploratory in nature; therefore the purpose of this report is to consider the concept of a Courtesy Envelope Pilot Program in principle only.

Considerations:

Public vs. Private Context

Currently the Toronto Parking Authority initiates courtesy envelopes as a voluntary compliance program at their off-street parking facilities. The fairness of this practice for off-street parking lots cannot be disputed. Off-street parking involves a private relationship between a customer and the operator of the parking facility. The customer accepts the private lot operator's prerogative to establish certain parking regulations, providing such regulations are fair, clearly

understood and accepted by the customer. By leaving a private vehicle parked at one of these facilities, the customer is in effect accepting the regulations imposed by the owner within the physical boundaries of the parking lot. In comparison, on-street parking is a privilege provided by the city for an established fee. It is clearly understood that failure to comply with the parking regulations established by the municipality, could result in strict enforcement and the issuance of a Parking Infraction Notice. There is an expectation on behalf of the public that a consistent set of rules, including enforcement of all parking regulations, will be applied equitably on all City of Toronto streets.

Differential Enforcement

The proposed pilot program would create a situation where residents in adjacent neighbourhoods would receive differential treatment for committing the identical parking infraction. An individual parked within an area governed by the pilot program would receive a courtesy envelope, while an individual parked in close proximity but outside the pilot program area, would receive a Parking Infraction Notice. This approach to on-street parking enforcement is not consistent with the fair and equitable enforcement policy employed by our Service. It could also create a situation where a single vehicle could receive both a courtesy envelope as well as a Parking Infraction Notice, should the vehicle be parked in violation of pay-and-display regulations at a location which later becomes a rush hour route.

Program Boundaries

The proposal from the City of Toronto Planning and Growth Management Committee requesting consideration be given to implementing a Courtesy Envelope Pilot Program indicates that it will involve “willing” Business Improvement Areas. A pilot program of this nature, involving only selected Business Improvement Areas could very well be viewed as providing preferential treatment to certain areas of the city. In addition, the process of defining the streets and portions of these streets in order to delineate the geographic boundaries of the program may result in criticism that the decisions are subjective, even arbitrary to those who have been excluded.

Increased Disputes

The equitable enforcement and fairness issues invoked by a selective approach to enforcement raises the potential for confusion among members of the public concerning the geographic boundaries of the program and could result in increased incidents of verbal and physical abuse towards parking enforcement officers. In consultation with the City of Toronto Revenue Services-Parking Tag Operations, it is anticipated that the volume of complaints received would also increase.

Risk to Program Compliance

The purpose of paid permitted parking on city streets is to ensure the availability of short-term parking which lends support to the commercial viability of business areas. Official enforcement of paid parking regulations ensures that paid permitted parking continues to achieve its objective of ensuring regular vehicle turnover. A voluntary system of courtesy envelopes may present

serious risk to vehicle turnover as the public becomes aware that it is possible to park all day in selected Business Improvement Areas.

Impact on Revenue

In consultation with City Revenue Services-Parking Tag Operations, a measurable decrease in net revenue brought on by decreased compliance would be anticipated if a Courtesy Envelope Pilot Program were implemented globally across the City. It is impossible to accurately project the impact on revenue as the recommendation from the Planning and Growth Management Committee did not suggest the geographical scope of the program nor the monetary value placed on the courtesy envelope.

Balanced Enforcement Approach

As referred to previously in this report, the Parking Enforcement Unit has implemented measures to promote a more customer-friendly, community oriented approach to parking enforcement. These measures include:

- A five (5) minute grace period observed by parking enforcement officers before issuing a ticket for expired pay-and-display receipts, allowing for a reasonable variance among different time displays;
- It is also a matter of unit policy that officers be alert to customer activity near pay-and-display machines in the event that a motorist may be in the process of purchasing a receipt;
- If a motorist receives a ticket while actively engaged in purchasing a receipt, the officer may recommend the ticket for cancellation.

These unit policies and procedures help to mitigate potential complaints of overzealous enforcement and are applied equitably to all pay-and-display areas.

Increased Parking Durations

In May 2007, Toronto City Council approved a recommendation from the Planning and Growth Management Committee to extend the maximum parking duration to 3 hours in areas of the city where a 2 hour limit previously existed. This change allows customers to purchase one additional hour of parking to accommodate those individuals engaged in activities where the driver expects to complete their activity within 2 hours but experiences an unexpected or unpredictable delay. The amended parking duration time limits adopted by the City represent a new measure to help promote a more customer-friendly parking environment, without significantly affecting the turnover of vehicles.

On-going Liaison with Municipal Partners

The Parking Enforcement Unit engages in regular meetings with the Toronto Parking Authority, the City Manager's Office and City of Toronto Revenue Services. The purpose of these meetings is to analyze pay-and-display usage and enforcement data. This is an on-going process to identify by geographic area, variance in public compliance and the possible factors influencing

the differences in compliance. The Parking Enforcement Unit ensures equitable deployment of personnel to support high public compliance in all areas of the city.

Conclusion:

The Toronto Police Service is committed to fair and consistent enforcement practices as part of its Traffic Safety Priority. The Service does not support an on-street Courtesy Envelope Pilot Program for the many reasons outlined in this report. The Parking Enforcement Unit acknowledges that the customer experience in Business Improvement Areas should be customer friendly. As a result, measures have been implemented to help instill this feeling among clientele frequenting these areas of the city. The 3-hour maximum parking period that has recently been approved by Toronto City Council is more accommodating to the needs and expectations of the community and will help promote a more consumer-friendly approach.

In conclusion, one of the most effective methods of ensuring a positive customer experience is the availability of short-term, on-street parking. The most efficient method of ensuring this situation exists is the official enforcement of on-street parking violations. The Toronto Police Service does not support a voluntary compliance approach to enforcement which may adversely affect public compliance, vehicle turnover and the safe and orderly movement of traffic on our streets.

Deputy Chief A.J. (Tony) Warr, Specialized Operations Command, will be in attendance to answer any questions that the Board may have regarding this report.

The Board received the foregoing report and agreed to forward a copy to the City of Toronto – Planning and Growth Management Committee for information.