

**Testimony of Allen Greenberg¹:
Zoning Commission Parking Policy & Regulations Hearing
Case #08-06-2**

Before the District of Columbia Zoning Commission
July 31, 2008

Summary: The Zoning Commission should enact the District Office of Planning's (OP) proposed zoning code changes to eliminate many off-street parking requirements. OP's proposal, if enacted, would implement the Comprehensive Plan Amendment Act of 2006, which calls for unbundling the cost of parking from residential units. This would substantially increase housing affordability and improve the environment through the encouragement of car-free living. Because the time lapse between projects being approved and then constructed and occupied is typically extensive, the District Department of Transportation (DDOT) would have sufficient time after the zoning code is amended to implement appropriate controls of residential on-street parking permits so as to avoid any spillover effects.

My name is Allen Greenberg and I have resided in Dupont Circle since 1992. I am privileged to testify before you this evening about the important and visionary changes contained in the District Office of Planning's proposals that pertain to car parking requirements for housing development, which would implement the Comprehensive Plan Amendment Act of 2006. Today, the Zoning Commission has a rare opportunity to revise the zoning regulations in a way that would substantially improve housing affordability in and provide environmental benefits to the District, and would allow the construction of new developments that are as walkable and charming as many of the District's historic developments that were built before today's off-street parking requirements made their construction illegal.

After allowing for extensive deliberations and considerable public input, the D.C. Council enacted the Comprehensive Plan Amendment Act of 2006. This resulted from a three-year deliberative process that included 24 large public meetings attended by more than 1,500 residents and stakeholders, 24 meetings of a Council- and Mayor-appointed Comprehensive Plan Revision Task Force, over 100 briefings with Advisory Neighborhood Commissions, a Mayor's hearing and two Council hearings. The D.C. Council unanimously adopted the revised the Comprehensive Plan on December 19, 2006 and it went into effect in March 2007.

Action T-3.2-D from the revised Comprehensive Plan, provides these instructions for amending the zoning code:

*Find ways to "unbundle" the cost of parking from residential units,
allowing those purchasing or renting property to opt out of buying or*

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renting parking spaces...These efforts should be coupled with programs to better manage residential off-street parking in neighborhoods of high parking demand, including adjustments to the costs of residential parking permits.

In order to decide upon its recommendations to implement the parking reform that is required here, OP commissioned Nelson\Nygaard, a preeminent transportation consulting firm that specializes in parking policy, to conduct best-practices research and established a Parking Work Group, which deliberated on five separate occasions.

The Office of Planning proposes a sensible means of implementing the Comprehensive Plan by eliminating parking minimums for all housing construction and also for other developments, except where it believes the potential for spillover effects would be greatest. This is consistent with the realization that the most important mechanism available to avoiding spillover parking effects is to better regulate on-street parking, because residential demand for on-street parking will always exceed supply in the District's most popular neighborhoods no matter how much off-street parking is required to be constructed with new development.

Off-street parking requirements interfere with adaptive reuse of older buildings and are an anathema to affordable housing. Requiring the construction of parking in excess of market demand has been shown, through extensive research, to add between \$52,000 and \$117,000 to the price of housing units—an amount exceeding the entire housing budget of many District minimum wage workers—and guarantees more car ownership, driving, traffic, and air pollution than if such parking were not mandated.

The sole reason to require any off-street parking with new housing developments is to reduce the likelihood that such developments will result in too much new demand for on-street parking. Off-street parking requirements would be completely unnecessary if the District adequately managed public, on-street parking through a combination of regulations and market-rate pricing. The District Department of Transportation has recently shown itself to be quite capable of managing on-street parking so that it does not get overwhelmed as a result of development spillover. Nothing OP is proposing for the zoning code related to unbundling of parking could have near the spillover effects of opening a new 41,000-seat baseball stadium with very few off-street parking spaces, but stadium neighbors have been nothing but praiseworthy of the effects of DDOT's system for requiring baseball fans who choose to drive to the stadium to pay what it has determined to be a market-clearing price of about \$20 to park on the street for up to four hours during games. (This compares to prices that range from \$15 for parking at the furthest lots to \$50 for premium valet parking at the stadium.)

Managing on-street parking to deal with the influx of demand from new residents is different from managing it to deal with new visitors, but the same basic challenges exist in each case and similar tools to those deployed at the baseball stadium may be used to address this new challenge.

I urge the Zoning Commission to comply with the Comprehensive Plan legal mandate to “find ways to ‘unbundle’ the cost of parking from residential units” by amending the zoning regulations now, as proposed by OP. Given that most projects take years to build, this would still give the D.C. Council and DDOT plenty of lead time to design and implement appropriate policies to manage public, on-street parking so that it will not be overwhelmed with new demand. Although not needed, if the Zoning Commission wants to provide even a bit more lead time, the effective date of the amendments could be set in the future, such as for three months out. In the unlikely event that the elected Council and Mayor and his DDOT Director fail to live up to their obligation to appropriately manage on-street parking, District voters will have ample opportunity to hold them accountable.

After the new code is put in place, the D.C. Council is likely to provide DDOT the authority it needs to ensure that the Residential Parking Permit (RPP) Program is reformed so that, in time, more permits will not be issued than on-street parking spaces are available. This is very similar to the situation of Council providing DDOT the authority to regulate and price on-street parking near the new baseball stadium. A likely outcome of the Zoning Commission amending the zoning code as proposed by OP is Council then adopting a short-term parking policy goal and providing DDOT the authority to take appropriate action to meet the goal. The goal might be to ensure that new so-called under-parked developments do not burden on-street neighborhood parking with new RPP-holders *more* than developments that include ample off-street parking do.

With a clear goal and the authority enacted to achieve it, DDOT might still choose to grandfather existing RPP-holder rights to cheap annual permits for at least a few years. Then, DDOT might determine how many new permits are appropriate for issuance in each RPP zone and either adjust prices in an attempt to sell approximately this number of permits or simply auction off all new permits. In neighborhoods where RPP demand currently exceeds supply, DDOT might gradually make fewer new permits available each year until the number of permits issued reflects the availability of on-street parking. New revenues from higher permit prices could be distributed to all residents in equal-value Metro farecards or alternatively applied to the District’s affordable housing trust fund.

Thank you for this opportunity to testify. I look forward to working with the Zoning Commission in promoting affordable housing, adaptive reuse of older buildings, and transit-oriented development by strategically eliminating car parking requirements consistent with recent changes in the Comprehensive Plan.