

COALITION FOR SMARTER GROWTH

ZONING COMMISSION
CASE No. 08-06-2
EXHIBIT No. 38

Testimony before
the D.C. Zoning Commission regarding:

SUPPORT for Case No. 08-06-2 (Comprehensive Zoning Regulations Rewrite: Parking)
By Cheryl Cort, Policy Director
July 31, 2008

Please accept these comments on behalf of the Coalition for Smarter Growth, a regional organization based in the District of Columbia focused on ensuring transportation and development decisions are made with genuine community involvement and accommodate growth while revitalizing communities, providing more housing and travel choices, and conserving our natural and historic areas. In addition to serving on the 2006 Comprehensive Plan task force, I fully participated in the Office of Planning work group that helped shape the proposed parking regulations. I am pleased to testify in full support of these proposed parking amendments. These revisions affirm what is best about our neighborhoods and city and help chart a course for a more environmentally sustainable and economically vibrant and inclusive city.

1958 Future vision of D.C.: Expressways, universal car ownership, the demise of transit

At the time that our city instituted its zoning code in 1958, urban planners of the era, including Harold Lewis, who wrote the new zoning plan for the city, envisioned a very different future. The Lewis plan cited the need to require off-street parking for all new development hoping for "...the eventual removal of curb parking and the subsequent freeing of the traffic arteries."

Lewis anticipated:

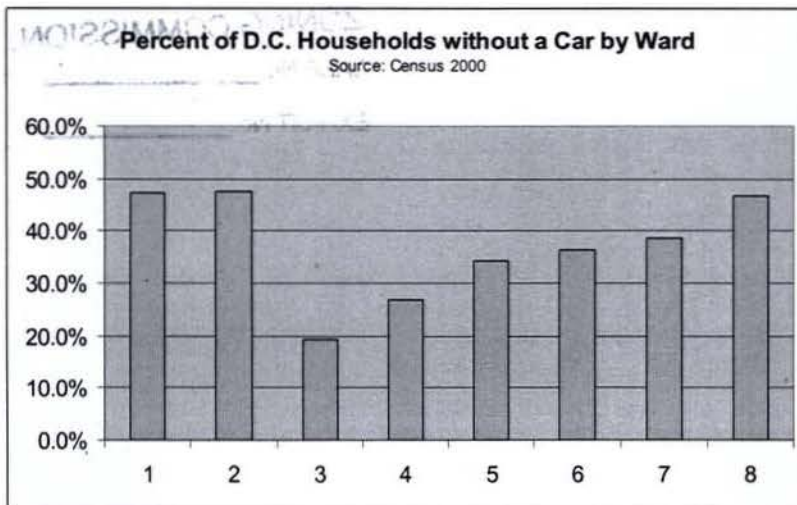
- the demise of public transit as a major mode of travel;
- universal car ownership;
- a network of expressways ringing downtown and crisscrossing neighborhoods;
- razing of old buildings to make way for needed parking lots and garages.

Given these trends, or perceived trends, Lewis called for the: "adaptation of the physical structure of the city to new forms of living...Inability to adapt to new forms will almost inevitably lead to its economic decay....Life in a metropolitan city had come to be dominated by the ownership of the automobile."

Today's reality – D.C. is a transit-oriented city where 20 – 50% of households do not own cars.

The future vision of the 1950s did not come to pass. Cities that relied on walking, transit and bicycling did not grow obsolete. In fact, D.C.'s vitality might best be credited to its many compact historic walkable neighborhoods and the rebirth of its transit system. Metrorail was built with the money allocated for the planned freeway system. Today, transit ridership is a major form of access for D.C. residents and workers. One third of D.C. workers ride transit, 11% walk, and 1.2% bicycle to work. D.C. has the second highest non-driving commute rate in the county; and the second highest walk to work rate. Automobile ownership is far from universal – 37 percent of D.C. households don't own a car. According

to the 2000 Census, Wards 2, 1 and 8 have the most households who do not own a car at 47 percent (see chart). In Logan Circle, 38 percent of residents walk all the way to their jobs. Far from universal, car ownership is one of many transportation options for D.C. households.



The 2006 Comprehensive Plan is a major departure from the 1958 vision of our city. Rather than viewing rowhouse neighborhoods as obsolete, the 2006 Comprehensive Plan affirms the qualities of these historic neighborhoods as something to preserve and enhance.

The 2006 Comprehensive Plan promotes alternatives to single passenger automobiles and recognizes that the city's planning efforts around Metro stations have focused on responding to our region's growth by

guiding "growth of the city in a way that minimizes the number and length of auto trips generated," and affirms working to "reduce household expenses on transportation by providing options for "car-free" (or one car) living." Unlike the 1950s vision, the Comprehensive Plan sees a vision of investing in new transit service, improving walking and bicycling, and better balancing the use of our public rights of way.

The Comprehensive Plan also puts a premium on growing an inclusive city. The plan lays out an ambitious set of policies and practices to make housing more affordable to the large share of moderate and low income families in our city who face steep cost burdens for housing. Statistics about our city demonstrate that we remain transit-oriented and that a large share of households save money by not owning a car and relying on transit. Parking requirements burden housing with extra costs that many households cannot afford to pay. Parking requirements also displace space that might have been used for homes or living space. Sadly, building required parking often means that those who do not own cars are subsidizing the rent for those who do – which is likely to mean those with less income are subsidizing those with higher incomes.

The damage done by parking minimums and lack of maximums

Parking requirements have been a major culprit in undermining historic building and street forms. If a hurricane knocked down my U Street rowhouse block tomorrow, it would be illegal to rebuild because few of the rowhouses on my block have off-street parking. The 1958 minimum parking requirements often disrupt continuous sidewalks in rowhouse neighborhoods with curb cuts, driveways and garages. The removal of parking requirements will legalize our historic sidewalk-oriented rowhouse neighborhoods. (see attached photos)

Urban design problems caused by parking requirements:

- Force curb cuts that take away parking as a shared on-street resource and privatize it;
- Curb cuts and driveways across sidewalks prioritize the public space for the use of private vehicles, degrading pedestrian safety and comfort;
- Added curb cuts add conflicts for pedestrians on the sidewalk and bicyclists and vehicles traveling in the streets as new points of entering vehicles need to be watched;
- Curb cuts remove on-street parking which exposes the sidewalk directly to moving traffic – and

- reduces the buffer for pedestrians on the sidewalk;
- Removed on-street parking can increase vehicle speeds;
- Space for parking often consumes space that could have been living space or more productive uses.

Parking minimums and the absence of parking maximums have led to many lost opportunities for more affordable housing or commercial space in redeveloping neighborhoods. I have witnessed the revision to a development plan that eliminated affordable housing for families in order to add more parking for cars to meet minimum parking requirements. This planned housing was steps away from the U Street Metro station. Two blocks away, a new residential building on the 1300 block of U Street – the Ellington – can't rent the parking spaces that it built at a 1:1 ratio and is advertising to the public to rent spaces.

On-street parking management is the main concern of D.C. car owners – this is the purview of DDOT

Off-street parking is often underutilized because its costs are reflected in the prices charged to users (\$40,000 purchase price, \$200 per monthly rental). The substantial inventory of vacant off-street parking supply in new buildings in Columbia Heights and U Street appear to have little effect on the demand for free on-street parking. Requiring off-street parking will not resolve the conflict over the expectation about the availability of free street parking for residents. To address concerns about the availability of street parking, DDOT needs to better manage the curbside. DDOT is piloting some programs to do this. The pilots seek to ensure better availability of parking for residents while discouraging outsiders from hunting for free parking in residential neighborhoods. We will work with DDOT to expand these programs to other neighborhoods facing similar conflicts over how on-street parking is managed.

Other key provisions of the parking regulations:

Maximums: While eliminating parking minimums is the most important change in regulations, instituting maximums where appropriate protects and enhances the city's competitive advantage as a transit-accessible, walkable, bikable place. Metro stations and other high density high transit corridors are places where maximums would be appropriate. The lightly used \$47 million Tax Increment Financed DC USA parking garage at the Columbia Heights Metro station is an example of the need to both eliminate minimums and institute maximums. The 1,000-space garage received a variance from the minimum required, yet the amount built was far above what was appropriate for the high density site in a transit-rich neighborhood where 70% of households don't own cars.

Car sharing: We support these requirements. Car sharing is an important new tool that bridges the gap for households which only sometimes need a car. It is cheaper than owning a car for the occasional user. Car sharing makes efficient use of costly space in compact neighborhoods. Studies on car sharing show that 40% of members give up their cars or decide not to purchase one. One shared car replaces 15 privately owned cars on average. I can personally attest to selling my seldom-used car when car sharing came to my neighborhood.

Bicycle parking: We support these requirements but ask that the commission consider the refinements proposed by the Washington Area Bicyclist Association.

Prohibition of curb cuts: We support relief from any parking requirement where a curb cut is prohibited.

Flexibility in parking requirements: We support these provisions because often zoning relief is given through the BZA but nothing is required in return. This is a more systematic way to provide flexibility while also generating significant public resources to provide transportation benefits to the neighborhood.

We expect these funds will be used to improve transit, walking and bicycling facilities and will work with DDOT ensure this. We also support the guidance to the BZA in the case of a variance.

Shared parking: Allowing for shared parking is a critically important provision because costly parking spaces are often built even if underutilized parking exists nearby. This provision makes efficient use of expensive off-street parking resources.

Landscaping requirements for parking lots: D.C. has long needed improvements to parking lot landscaping requirements. We believe the proposed requirements were carefully developed and represent national best practices. They will be a significant improvement to existing standards and the poor conditions of existing parking lots in the city.

In conclusion, we urge you to adopt these proposed regulations. We believe this proposal fulfills the intention of the 2006 Comprehensive Plan and builds on the strength of our city as we prepare for a future of rising demand to live and work in efficient, convenient, walkable, transit-accessible communities.

Thank you for your consideration.

parking, even in those zones without minimum requirements. They have no reason to skimp, especially if they know on-street spaces are tightly managed. Eliminating minimum requirements will encourage creativity and flexibility in meeting parking demand. For example, if a project is near a Metro station, or near an existing garage with lots of unoccupied spaces, it may not require as much parking on-site. After eliminating minimums, space will be used more efficiently and people will still be able to find parking.

Conclusion and Next Steps

The zoning code has a great deal of influence over how D.C. looks and feels, and how people get around. D.C.'s 1958 zoning code is, not surprisingly, based on a vision of the city that is dominated by the automobile. By reforming parking provisions, the Office of Planning's proposal will eliminate the bias in favor of the automobile, make D.C. a more attractive place to live and work, and put the city in a better position to address major challenges of the 21st century, such as congestion, pollution, affordable housing, and energy efficiency. On July 31, 2008, the D.C. Zoning Commission will hold a public hearing to consider the proposal. Your support will help ensure its success.

References:

The D.C. Office of Planning website on parking issues includes draft regulations, public comments, and background:
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Leave the 1950s Behind!

The Case for Eliminating Minimum Parking Requirements

For over fifty years, the D.C. zoning code has required almost all new construction in the city to include off-street parking even when unnecessary. This 1958 automobile-oriented vision is no longer appropriate in today's world of high gas prices, congested roads, and global warming.

The Proposal in a Nutshell

D.C.'s Office of Planning proposed a reform of parking regulations that includes the elimination of minimum parking requirements for all residential development and some other properties in certain zones and sets maximum limits on parking throughout the city. In addition, the proposal encourages bicycling by requiring most large buildings to include adequate bicycle parking and promotes car-sharing by requiring all projects with large amounts of parking to devote spaces to car-sharing organizations. Finally, the proposal allows some flexibility to build less parking than the remaining minimums or more than the maximum limits would require, in exchange for a substantial fee, which could finance neighborhood improvements to transit, bicycling, and pedestrian facilities.

Why We Need Change

The Office of Planning's proposal reflects a trend among urban planners and environmental advocates, who have advocated a fundamental reform of parking policy as an important part of smart growth strategy for D.C. Some of their main arguments are listed below:

- **More parking in D.C. means more cars in D.C.**

If minimum parking requirements are retained, most new residential and office development in the District will include parking, whether it is needed or not. This will mean thousands more parking spaces



Rush Hour Traffic in DC: minimum parking requirements encourage people to drive

and thousands more cars to park in them. Studies show that when parking is scarce and priced, people drive less and own fewer cars. Does D.C. really want more cars and more traffic when alternative means of transportation are available?

- **Minimum parking requirements can disrupt our neighborhoods**

Beloved, historic neighborhoods in D.C., such as Georgetown and Capitol Hill, were built before minimum parking requirements. They generally do not include driveways, curb cuts, or surface parking lots, which helps explain why these neighborhoods are so walkable and popular. Minimum parking requirements make it essentially illegal to build such neighborhoods today.



- **Building more off-street parking will not solve the “parking problem”**

There are many garages that are underutilized because curbside parking is cheaper or free. If we price curbspace to ensure availability and let the market do its work, existing garages will be used more.

- **Minimum parking requirements reduce the quality of development**

New projects devote so much space, money, or both to parking spaces, that developers have to cut costs elsewhere. They may build a smaller store, or fewer homes, or spend less on the façade and landscaping. Ultimately, unnecessary parking can reduce the quality of new buildings, which affects us all.

- **Minimum parking requirements increase the cost of housing**

Underground parking costs as much as \$30,000 - \$50,000, meaning a relatively small garage of only thirty spaces can easily cost over \$1 million. The result is higher rents. Studies have found that minimum parking requirements can increase the cost of housing by 10-20%. The bottom line is that minimum parking requirements make housing less affordable for D.C. residents.



Beautiful neighborhoods without off-street parking, such as Capitol Hill, are outlawed by minimum parking requirements

Answers to Common Concerns

- **Will apartments and condo buildings include parking? Where will people park?**

Most projects will continue to include parking based on market demand. Buildings with less parking will attract people who do not own cars. Increasingly, D.C. is livable without owning a car. In fact, 37% of households in D.C. are already carless and in many neighborhoods, the percentage is higher. With new ideas like car-sharing, (ie: Zipcar), it will get even easier. In San Francisco, after joining a car-sharing organization, 30% of households reduced their car ownership and more than 60% decided against purchasing an additional car. People who have a car will more likely look for an apartment with a garage to avoid the hassle of finding a curbside space that may be far away. Finally, if D.C. better manages curbside spaces, either through pricing or improvements to the residential parking permit program, it can address issues of parking scarcity.

- **What about retail development? Will it include enough parking? Where will people park?**

First, minimum requirements will still apply to all non-residential projects in zones R-1 through R-5B, as well as in zone C-2. This means that, in most of the city, all retail and commercial developments will still be required to build parking.

Second, developers understand that retail customers must have easy access to the stores or the project will fail. Therefore, if walking, cycling, or public transportation are not viable, developers will build





