

MEMORANDUM

TO: Zoning Commission for the District of Columbia
FROM: Travis Parker, Zoning Review Manager *TP*
DATE: July 15, 2008
SUBJECT: ZC Case 08-06-2
Proposed Amendments to the Parking Regulations 11 DCMR

I. ZONING REVIEW PROCESS

The 2006 Comprehensive Plan for the District of Columbia states that "The Zoning Regulations...need substantial revision and reorganization, ranging from new definitions to updated development and design standards and even new Zones"¹. It goes on to note that "a major revision to the Zoning Regulations is planned for 2007-2009"². OP has designed a three year process to produce recommended changes to clarify, simplify and update the current Regulations.

Regulations are currently being reviewed by subject area, with up to twenty subject areas, designed for discussion with public working groups' around issues identified in the Comprehensive Plan and potential conflicts in the Zoning Regulations. Recommend changes are then forwarded to a Task Force of twenty four members for further review and input. Finally, recommendations for each subject area will be available for public review including a hearing before the Zoning Commission. After the conclusion of public review for all subject areas, OP will work with the Office of the Attorney General to draft zoning language to reflect the proposed policy changes.

Drafting the language as one single document rather than for each subject area allows for the overlap between the different subject areas and establishes a cohesive writing style and format. The recommendations for the first three subject areas (height, parking, and loading) were written as draft zoning language and have been advertised as such. It is anticipated that these three subject areas will be reviewed by the Commission as stand alone chapters and then included, with any necessary format changes, in the final document when it is produced. The remainder of the subject areas will be produced as one document based on approval of Commission at the subject area hearings.

ZONING COMMISSION
District of Columbia

CASE NO. 08-06-2
EXHIBIT NO. 4

¹ Comprehensive Plan for the National Capital: District Elements, IM-1.3 Zoning Regulations and Consistency

² Ibid.

II. PARKING SUBJECT AREA PROCESS

The Parking Working Group began meeting on February 20, 2008 and consisted of a broad range of citizens; planning, zoning, legal and smart growth professionals; ANC members; and representatives of government agencies, including DDOT. The group assisted OP in reviewing the current regulations, identifying and analyzing issues, and developing alternatives for resolution of the current issues, ambiguities and inconsistencies. Four, 2-3 hour meetings were held relative to parking issues and one relative to loading and the group supplied OP with extensive comments, both directly and indirectly through the dedicated zoning review website. Working Group and Task Force comments are attached as appendices to this report. OP thanks the members of this working group for volunteering their time and effort to share their ideas and offer their assistance.

This consultation process and application of some of the Nelson Nygaard recommendations led to OP's preliminary recommendations for this subject area. These were sent to the Zoning Taskforce for a 30-day review and comment period culminating in discussions at the March and July 2008 Taskforce meetings. Recommendations were posted on the website at the end of this period.

III. PARKING SUBJECT AREA REPORT

This report is intended to provide the context for the proposed policy shifts relative to the parking regulations and standards prescribed primarily in Chapter 21, 11 DCMR and those referenced in other provisions, including Chapter 23 and others throughout the zoning code. The proposed policy changes include:

- General removal of parking minimums
- Retention of minimums for uses that are of concern to residential neighborhoods
- Setting of parking maximums
- Supportive strategies, including:
 - Shared Parking – allowing minimum parking requirements to be met by spaces that are shared among multiple uses or destinations;
 - Car-share Parking – Encouraging or requiring that a set number of spaces within accessory parking inventories be offered to established car-sharing companies;
 - In-Lieu Fees – Allowing developers to build fewer spaces than required in return for payment of a fee that typically is used to fund either the construction of public; shared parking facilities or general mobility investments (transit, streetscape,, bike racks, etc.);
 - Bike Parking – Establishing a schedule of bike parking requirements with location standards for bike parking and quantitative and qualitative requirements.

The guidance of the District's residents reflected in the 2006 Comprehensive Plan provides the impetus for a review of the relationship between land use and transportation policies, and more specifically parking policies, which should reflect the varied transportation choices in our urban area. To promote land-efficient development that supports these non-automobile choices in the future, parking policies should be revised to use existing parking supply more efficiently and provide a variety of options to access parking for future development.

There are approximately 400,000 parking spaces in the District of Columbia. While the majority of these parking spaces (260,000) are on-street parallel-parking type spaces, another 140,000 parking spaces are located off-street in parking lots and parking garages.³ Parking or car storage is part of almost every car trip, whether short or long term, and when free is an important factor in the mode choice for a trip. The availability and price of parking can influence people's choices about how to travel to work, shop, and conduct personal business. The District is challenged like many jurisdictions to balance the need for on-site parking spaces to accommodate ever increasing parking demand with available travel choices, housing costs, and neighborhood concerns regarding parking spillover.

Nelson Nygaard Study (May 2008)

In response to the Comprehensive Plan's directives, OP, in conjunction with the District Department of Transportation (DDOT), commissioned Nelson Nygaard Consulting Associates to assess appropriate parking requirement changes and approaches for the District as part of the process of revising its code. The project's Technical Advisory Committee (TAC) was assembled in May 2007 and included DDOT staff, the Downtown Business Improvement District (BID) and OP. The Nelson Nygaard (NN) study was completed in May 2008, and can be accessed in its entirety on the zoning review's dedicated website www.dczoningupdate.org

The findings recognized that the District was not alone in its evaluation of their existing standards and in particular questioned the validity of minimum parking requirements, while attempting to balance resident's concerns regarding spillover. A review of the project findings by the TAC helped to assess preferred levels and forms of zoning changes and a consensus was reached that an approach of minimum and maximum parking limits should be explored. The policy shift was informed by several factors including:

- Traffic congestion on local and regional roadways
- Housing Affordability
- Preserving and expanding high quality neighborhood design
- High quality transit access throughout most of the District
- Evidence that some builders would build less parking if allowed by zoning
- The tendency of some developers to "over-park" projects as a concession to neighborhood concern about spillover.

The resulting report is a recommended framework intended to guide the definite standards once categories of land use and zoning districts are established in the revised code.

BACKGROUND

The District's parking standards as outlined in the Zoning Regulations were established in 1958 based on the policies of the 1956 Harold Lewis report, which at the time recognized that streets:

"...were intended primarily for moving traffic and for access to abutting property. Unfortunately they were also being used, to a great extent, as garages for the storage of passenger cars. There is no longer any justification for this or for their use for the

³ 2006 Comprehensive Plan : T-3.2 Curbside Management and Parking 415.2

frequent parking of heavy trucks while loading or unloading merchandise. Space for each of these activities should be provided by the property owner off-street and in general on the lot where the building to be served is located.”

Today there is a general shift away from this original intent guided by the theory of complete streets to create better neighborhood designs. The application of context sensitive solutions (CSS) in the planning and design for walkable communities are already reflected in many of DC’s best recognized residential districts such as Capitol Hill, Georgetown, Kalorama and Historic Anacostia, which were in existence prior to the parking requirements of the 1958 Zoning Regulations. Parking standards today prescribe a one-to-one ratio for residential development and since 1958 most new residential development has been built with its own parking spaces.

The parking requirements for non-residential development subsequent to the 1956 Lewis report assumed cars as the preferred mode of choice for transportation and that parking would be provided ad infinitum. The regulations sought to include the design of places as much for parking as for people, which encouraged more traffic onto our streets in search of free and convenient parking. The regulations’ existing parking standards fail to recognize the special qualities of our neighborhoods which work well precisely because they are able to support less dependency on automobile use and are supported by varied transportation choices. The negative effects of parking are readily seen where curb cuts and garage entries hinder bike and pedestrian activity in mixed use neighborhoods and degrade the quality of commercial areas.

For new developments with characteristics that reduce automobile use – mixed-use, transit rich, charging for parking - the ITE estimates typically used by traffic studies are based on suburban land use models which do not take these factors into account, and in many cases overestimate the amount of traffic generated by similar uses in an urban, mixed-use neighborhood. Thus, when facilities are designed to cater to the maximum demand that may occur in an urban environment, one can end up with too much. ITE has long advised engineers to take account of alternatives to the private automobile and modify trip-generation rates accordingly.⁴

If the parking regulations were revised to capitalize on the District’s urban qualities, new development would follow a less auto-dependant pattern and add to the character of the existing and new neighborhoods of the future.

The Comprehensive Plan

The 2006 Comprehensive Plan attempts to redirect the vehicle-accommodating policies of the past and states that:

“Fully capitalizing on the investment made in Metrorail requires better use of the land around transit stations and along transit corridors. Some stations continue to be surrounded by large surface parking lots and auto-oriented commercial land uses.The District’s Metrorail stations include 15 stations within the Central Employment Area and 25 “neighborhood” stations. Looking forward, certain principles should be applied in the management of land around all of the District’s neighborhood stations. These include:

⁴ Millard Ball, Allan and Siegman, Patrick: Playing The Numbers Game - Planning May 2006 pg. 20 (APA-Special Issue on Transportation)

- ***A priority on attractive, pedestrian-friendly design and a de-emphasis on auto-oriented uses and surface parking;*** LU-1.3 Transit-Oriented and Corridor Development 306

The Plan directs planning and zoning efforts to ***“encourage the creative management of parking around transit stations, ensuring that automobile needs are balanced with transit, pedestrian, and bicycle travel needs. New parking should generally be set behind or underneath buildings and geared toward short-term users rather than all-day commuters. Policy LU-1.1.3: Central Employment Area 306.15***

Revisions to the District’s Zoning Regulations should ***“ensure that parking requirements for residential buildings are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including proximity to transit). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated. Policy LU-2.1.11: Residential Parking Requirements 309.16***

In summary, the 2006 Comprehensive Plan addressed the need for revision of the parking regulations throughout the document, with primary emphasis placed on:

1. Developing and implementing programs to improve parking management strategies/programs in the commercial and residential districts. (LU 2.4.8, T3.2.2, EDU 3.35, RCE 2.1.A, CW 2.4 C, MC 1.1.8, MC 2.2.4, MC 2.7.2, RCW)
2. Management of parking demand shared parking strategies and ensuring that parking is addressed when co-location of uses occurs. (CW 1.1.16, NW 1.1.10, NNW 2.3B) (EDU 2.1, EDU 1.5.5)
3. Reducing parking with TDM Strategies. (LU1.3A, NNW 2.5.2)
4. Reducing surface parking lots, visual improvement and location. (LU 1.3.4, UD 2.210, PROS 3.2.7, Action UD 3.1D, FNS 1.2.3, AW 2.3.2, AW 2.1.3)
5. Creating green parking, with landscaping standards. (UD 2.2.10, PROS 3.2.7, HP 2.5.4)
6. Increased demand for parking structures. (UD 2.211, CH 2.1., FSS 2.1B, MC 1.1D MC 2.1B)
7. Curb cuts and multiple vehicle access points. (T1.2.3)
8. Unbundling of parking costs. (Action T3.2D)

These policies and actions are similarly repeated throughout the Plan (as referenced above).

RETHINKING DC’S PARKING REQUIREMENTS

This report is also informed by recent studies, literature and available statistics and government reports which reflect the potential paradigm shift being experienced throughout the country ascribed to the inter-related realities of congestion, increased gas prices, smart growth and the limited availability of land in the District to accommodate car storage. While there is a desire to do more sophisticated analysis, the data is expensive to collect and OP has attempted to use available census data applicable to car ownership patterns and transit ridership, as well as

parking garage usage in some limited areas of the District, and was “encouraged to make use of the extensive literature that already exists on factors which affect the subject of this report.”⁵

Many inter-related factors of smart growth and sustainability have a direct effect on the provision of parking. OP review includes examples of the inter-relationship among some of these factors in support of the new proposals which seek to maintain the quality of the District’s neighborhoods and to ensure that future development is sustainable.

a. Housing Affordability and Transportation vs Parking Requirements

The Center for Housing Policy’s 2006 report⁶ examined the housing and transportation cost burdens of working families in 28 metropolitan areas at the neighborhood level, with a detailed look at 10 metropolitan areas which included the Washington DC-Baltimore area. The study points to the importance of infill development that expands the supply of affordable housing in inner city and older suburban neighborhoods; policies to encourage car sharing and to reduce the costs of car ownership for families who cannot easily get to work via public transportation. The study suggests it is imperative for cities and regions to consider housing and transportation policy together. The study determined that the Washington-DC-Baltimore area has one of the least affordable housing markets. However, other studies demonstrate that the ability to modify transportation costs through the use of transit and lower vehicle ownership can make the combined costs of housing and transportation lower in even the most expensive markets.⁷

Consumer Expenditure Survey data collected on an ongoing basis by the US Census Bureau for the Bureau of Labor Statistics (BLS) provides average expenditures for consumer units. The Expenditure Survey for the Washington Metro Area (2005-2006) indicates that Washingtonians have the least transportation expenditure overall but spent a larger share of it on public transportation (\$747) among all consumer units in the South (\$305), including, Baltimore (\$476), Atlanta (\$364), Miami (\$437), Dallas-Fort Worth (\$517), and Houston (\$519). With the exception of New York City (\$1,022), this unit was also higher than the public transportation expenditure for the northeast (\$633) including, Philadelphia (\$421) and Boston (\$576).

When transportation costs are taken into account, several of the places with the highest median home values according to the American Community Survey (2003) - San Francisco, Boston, New York, and Washington DC – are not necessarily the most expensive, in part due to their higher incomes and lower transportation costs.⁸ A household’s ability to replace auto use and ownership with public transportation, walking or biking translates into a lower portion of its budget going to transportation.

The graph below shows no significant change in the vehicle ownership patterns by residential status in the District for the past seven years. However, it is posited that “...*regardless of average household vehicle ownership rates—and regardless of household income—some households will choose to own multiple vehicles and some will choose to own none, although*

⁵ Millard Ball, Allan and Siegman, Patrick: Playing The Numbers Game - Planning May 2006 pg. 20 (APA-Special Issue on Transportation)

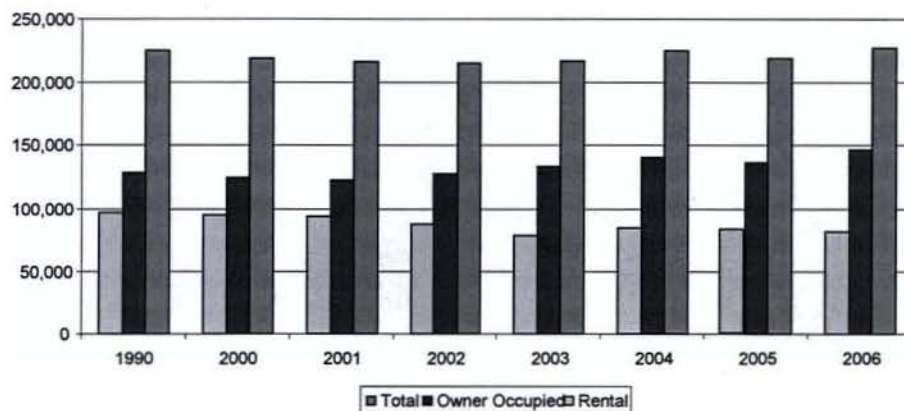
⁶ *A Heavy Load: The Combined Housing and Transportation Burdens of Working Families* – Center for Housing Policy, October 2006. http://www.nhc.org/pdf/pub_heavy_load_10_06.pdf

⁷ *Driven To Spend: Pumping Dollars out of Our Households and Communities (June 2005)*. Center for Neighborhood Technology and Surface Transportation Policy Project

⁸ *The Brookings Institute – Urban Markets Initiative -January 2006*. Affordability Index = (Housing Costs + Transportation Costs)/ Income: current housing sales prices and rent+ costs of auto ownership, auto use and transit/ income.

households in all income groups will on average choose to own fewer vehicles if parking minimums were eliminated and parking costs were unbundled from housing costs.”⁹

Number of Vehicles Available by Tenure for District of Columbia (by Year)



Allen Greenberg’s 2004 study ⁽⁹⁾ also stated that:

“Past research on parking requirements on housing affordability shows that minimum parking requirements raise housing costs substantially; however, parking’s negative effects on housing affordability have, despite this general finding, been very much underestimated.

For example, while research on this subject generally attempts to quantify the building costs of off-street parking, it only rarely attempts to quantify its often greater effects on price, and typically fails to also acknowledge that many lenders, especially in some targeted cities, will allow substantially higher mortgage loans for households minimizing or avoiding car ownership—which minimum parking requirements discourage. To fairly calculate the impact of minimum housing requirements on housing affordability, both the actual price increase resulting from the parking and the opportunity cost of lost eligibility for a higher loan amount need to be considered.”

RECENT EXAMPLES

ULI’s Case Study Series held on June 11, 2008 included a presentation by design architects Torti Gallas and Partners (partially shown below) on development around the transit rich corridor of the Columbia Heights neighborhood¹⁰. According to provided information¹¹:

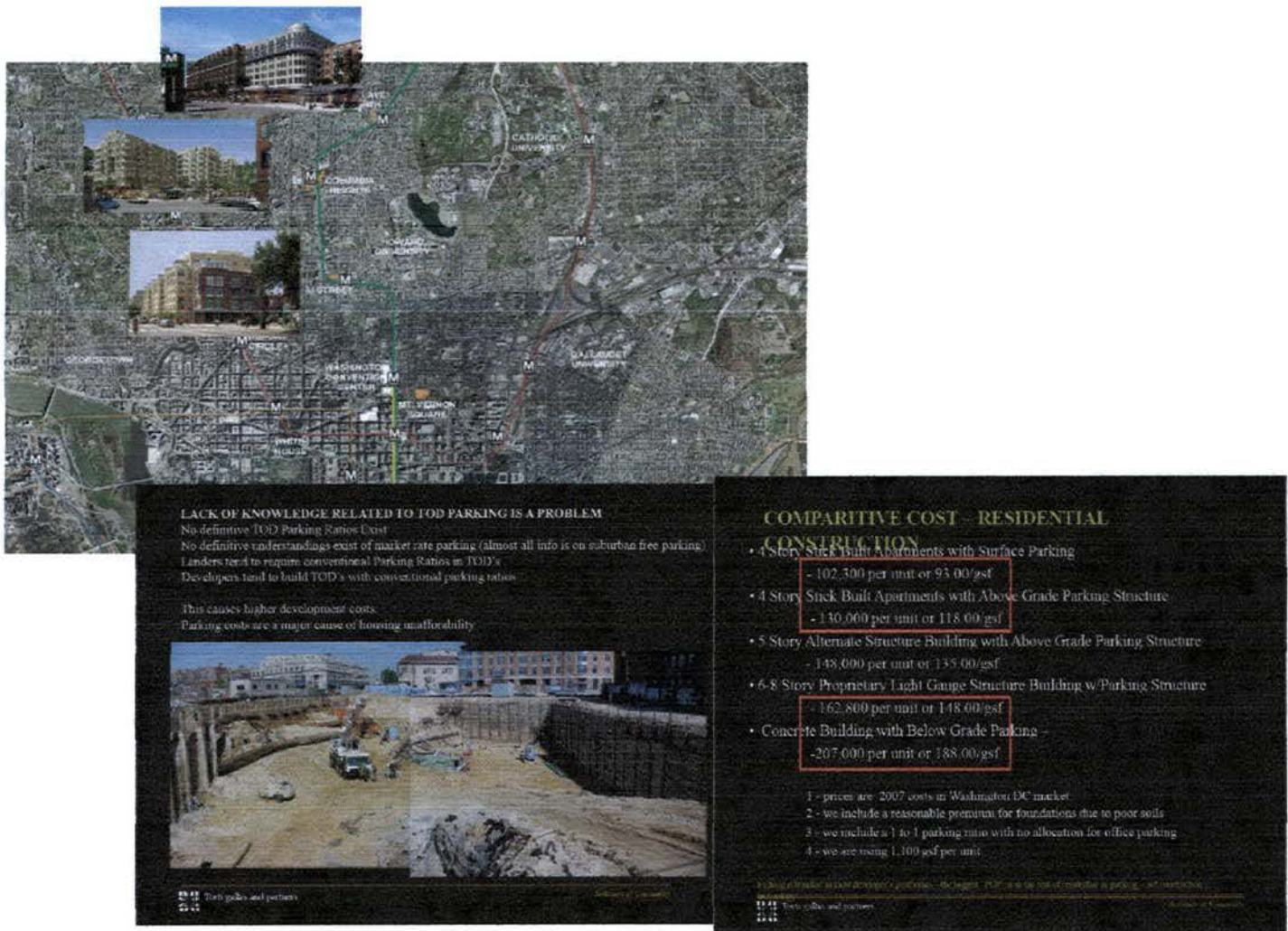
⁹ Greenberg, Allen AICP *How Each New Parking Space Effectively Adds Over \$63,000 to Typical Urban Housing Costs* (2004)

¹⁰ Witness the Change in Columbia Heights, D.C. (June 11, 2008) - Urban Land Institute’s Case Study Series (2008) http://www.uli.org/Content/NavigationMenu30/Events/Case_Study_-_Witness.htm

¹¹ Goodspeed, Rob *The Ground Floor*, Urban Land Institute (June 13, 2008)

“All of the attendees underscored the issue of parking....and that the “lack of knowledge of TOD parking is a major problem...” although 90% of apartments have rented in Highland Park, only 9 parking spaces have been purchased, forcing (the developer)... to look to local schools who may be willing to pay for parking.”

With respect to the retail component of the development which accommodates major retailers Best Buy, Target and others (DC USA), it continued that “...although not all the retail space at DCUSA has been leased, parking in the underground structure has been under-utilized. Although the city’s rezoning process could drastically reduce requirements, the developers underscored the need for data to assure tenants and financiers the viability of retail with less parking than suburban locations.”



The 1,015-space garage at the DC USA project was originally required by zoning to contain 1,600 spaces. A parking reduction would have required relief through a zoning variance for 1,000 spaces. Recent data suggests that usage for this garage is currently well below capacity. Recent select data of metro accessible apartments in the District showed that 85% of the parking spaces were utilized, with prices ranging between \$195 per month (1st space) to \$225 per month (2nd space) for 89% apartment occupancy.

As stated by the project architects “...Parking is bundled in most developers’ proformas with the biggest share going to residential parking – not construction technology.” The price comparison for units shown in the slide above are helpful in understanding the principle of cost transference

between the provision of parking and affordability of units in new development in today's dollars. Thus, excessive parking requirements impose several costs as they force residents to pay for parking facilities even if they do not own a car. Further, vehicle ownership could also increase causing additional traffic congestion and air pollution. Imposition of minimum requirements on urban development can be shown to have a negative effect on the cost of home ownership in transit-rich neighborhoods.

Since alternatives to driving are abundant on transit-available streets in the District, dedicated off-street parking for housing should not be required but can be permitted as an option for developers. Instead of required minimum parking, developers could be provided the option to invest in street and pedestrian improvements that make alternative modes more attractive and accessible.

b. Commuter Mode Choices and Parking

Research studies to assess the effect of free parking on mode choices and parking demand have emerged in light of increased congestion on the nation's roads by drive alone commuters. It is contended that when commuters can park their car free at work, they are more likely to drive alone.¹² A survey conducted by the Portland Metropolitan Services District (Portland Metro) using data of 9,471 persons reporting 122,348 activities and 67,981 valid trips was used to determine the relationship between the built environment and transportation behavior. The 2001 study derived a model which produced two key findings:

- Parking cost and travel time by transit influence mode choice decision for commuters, suggesting that increasing the cost of parking at work sites and decreasing transit travel time will reduce the percentage of drive-alone workers.
- Two land use variables used in the mode choice model – proximity to light rail and pedestrian connectivity – did not have a significant effect on mode choice.

The findings supported the contention that urban form has little effect on mode choice decisions. However, from a policy perspective, it was contended that:

“... free parking by employers were at odds with policies designed to decrease solo driving and thus adversely affects externalities associated with automobile use – traffic congestion and air quality. In addition, the results according to the researchers indicated that urban planners and transportation analysts would have the greatest success in influencing the mode preference of individuals by charging commuters the true cost of parking or allowing commuters to increase their income by cashing out their spaces when they choose to commute by another mode.”

A recent survey¹³ completed for the Arlington County Commuter Services program studied the relative roles of various factors on business location decisions and on employees' travel choices in Arlington County, VA. Data was collected for 19 office buildings in various parts of the county including the Rosslyn-Ballston Corridor, Crystal City and other areas of the County and buildings were selected to provide a mix of location, transit and other characteristics. The preliminary analysis included:

¹² Hess, B. *Effect of Free Parking on Commuter Mode Choice*- Transportation Research Record 1753, Paper No. 01-0448 (2001) <http://pubsindex.trb.org/document/view/default.asp?lbid=695855>

¹³ Arlington County Commercial Building Research – LDA Consulting and Southeastern Institute of Research, Arlington County Commuter Services – June 18, 2008

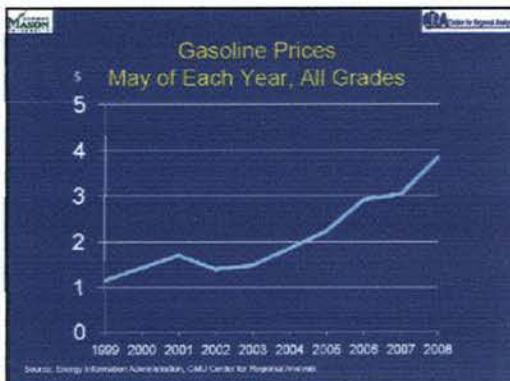
- Distance to Metro rail (less than 2 blocks, 3-5 blocks, 6-10 blocks, more than 10 blocks and not in metrorail corridor)
- Level of “urban-ness” (low, medium, high, very high)
- Availability of commuter services
- Parking availability and charges

Among other outcomes, the survey revealed that there was no statistical difference in commute satisfaction between employees who drove alone to work (47%) and those who used an alternative mode (45%) (e.g transit, car pool, bike/walk). While those who primarily drove alone believed fewer transportation demand management (TDM) services were offered to them than was actually the case, alternative mode users were more likely to be aware of TDM services than were drive alone respondents. In summary, this study showed that both TDM and parking influence mode split and the drive-alone rate drops substantially as TDM level rises, as parking becomes more constrained, and as parking charges rise.

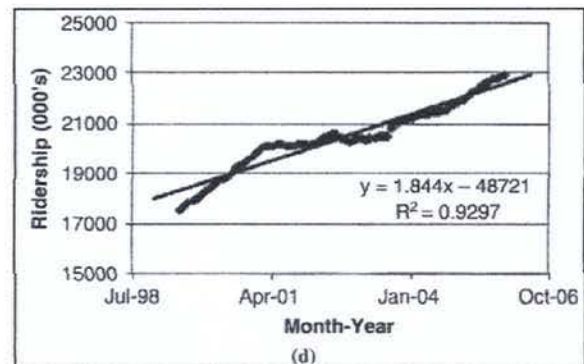
As the study is currently on-going, further regression analysis is being conducted to examine the relative impacts of various factors on drive alone, transit, and bike/walk rates including (but not limited to) metro distance, TDM service level, parking availability and parking fees.

c. Gas Prices and Transit Ridership

It is currently being acknowledged that as gasoline prices rise, transit agencies have seen an increase in ridership.



Source: Energy Information Administration
George Mason Center for Regional Analysis



The District-based WMATA states that metro ridership increased by 4.3% in April (2008) over the same period last year.¹⁴ A Transportation Research Board study (2007)¹⁵ compared five U.S. cities on the basis of their level of automobile orientation and the extent and variety of transit services: Atlanta, Georgia; Dallas, Texas; Los Angeles, California; San Francisco, California; and Washington, D.C. Most of the transit systems in the five cities analyzed have experienced

¹⁴ Aryanpour, A. *Public Transit Feels the Pinch of Gas Prices* Washington Post, Thursday, May 28, 2008

¹⁵ Haire, A. and Machemehl, R. *Impact of Rising Fuel Prices on U.S. Transit Ridership*. (2007)

<http://dx.doi.org/10.3141/1992-02>

ridership growth since early 2004. Exceptions include the Atlanta bus and heavy rail systems and the San Francisco bus systems. The study examined the correlation between ridership and fuel prices and found that it was statistically significant for all systems. This finding indicates that fuel price increases have indeed played a role in encouraging transit use in historically automobile-oriented American cities. The empirical relationships between fuel price and transit demand were also explored. Results indicate that, on average, as fuel price increases by 1%, transit demand increases on the order of 0.24%; in other words, ridership increases approximately 0.09% for each \$0.01 increase in fuel price.

OP believes that while these recent findings may have implications for transit agencies with respect to improvements in their systems, it is also instructive for planning and zoning policy decisions, which were originally designed around auto-use.^{16/17}

PARKING POLICY RECOMMENDATIONS

In addition to the overall Zoning Review objectives of clarity, relevance, and ease of use, the Working Group review was guided by policies in the Comprehensive Plan, which acknowledge the importance of maintaining Washington's unique neighborhoods while accommodating continued development, and growth.

The draft language circulated in the Hearing Notice for July 31, 2008 is not intended to represent the exact language that will be adopted for the Zoning Regulations. The concepts will be refined and re-advertized for other public hearing as may be necessary due to additional input from the Commission and the public. The drafting of zoning language will commence after the public review of the concepts is completed and the Zoning Commission has given its initial comments. OP will work with OAG to draft language that encapsulates concepts approved by the Zoning Commission.

It is important to note that proposed policy changes would apply only to new construction or changes of use after the final versions of these proposals are adopted. Each policy recommendation is structured as follows:

- Existing Practice
- Issues
- Recommendation
- Analysis
- Public Comments and OP Response
- Related Issues

1. PARKING MINIMUMS

Existing Practice

On-site parking is required for all uses in all zones. Some relief is available by special exception downtown and near certain Metro stations.

¹⁶ *The American Culture is Running Out of Gas*. The Philadelphia Enquirer- May 18, 2008

¹⁷ LA workers swap cars for subway. BBC News May 22, 2008

Issues

Current parking standards do not reflect the traffic and parking policies of the city or the Comprehensive Plan.

Recommendation 1

As a general rule, minimum parking standards should be removed from the parking schedule. Parking minimums will be maintained in those areas where there will remain the potential for spillover effects, specifically:

- 1. Non-residential uses in (predominantly) single-family and rowhouse areas**
- 2. Retail, Office, Restaurant or Service uses in commercial corridors near (predominantly) single-family and rowhouse zones**

Analysis

Minimum parking requirements, originally implemented to protect curbside parking spaces from demand generated by newly developed land uses, tend to require more parking than is needed to accommodate average daily demand. Excess off-street parking:

- Increases the cost of housing units and decreases the number of units that can be built
- Makes certain construction types infeasible, significantly increasing the costs of development
- Precludes or limits many types of development on small parcels
- Precludes more intensive uses, such as restaurants, from re-using existing buildings that do not meet the higher parking requirement
- May result in discontinuous retail frontages, as curb cuts and driveways replace storefronts to provide parking access
- Results in a lower market price of parking, thereby increasing traffic generation by as much as 40%, and hiding the costs of parking in the cost of housing, goods, and services
- Spreads destinations apart, resulting in further walking and driving distances
- Creates service-level barriers for other modes by increasing travel distances and conflict points with vehicles entering and exiting driveways
- Creates barriers to high-quality urban design by creating gaps within corridors
- Encourages reliance upon personal auto travel

The effectiveness of contemporary on-street parking management tools, either currently in use or soon to be available to the District of Columbia, greatly reduces the need for these historic forms of regulation, allowing zoning to better reflect current transportation priorities, opportunities, and constraints. DDOT is currently working on new methods of curbside parking management in locations around the city and expects to continue to improve on-street parking availability.

The recommendation would not preclude the construction of parking. OP anticipates that for the foreseeable future most development will continue to contain as much or more parking than our current regulations require. The changes would serve in the short term to lessen a large number

of parking-related variances where parking is difficult or impossible to provide, and in the longer term to address many of the issues described above.

The recommended framework therefore emphasizes removing all minimum parking requirements except in circumstances where on-street parking management is anticipated to remain constrained, or for uses for which there is a history of public sensitivity to parking “overspill” conditions. Over time, remaining minimum requirements could be phased out if on-street parking availability improves in these areas.

This analysis is presented in further detail in the May 2008 parking report completed for the Office of Planning by Nelson/Nygaard consulting associates.

Public Comment and OP response

- *There is no basis for the claimed benefits associated with eliminating or reducing minimum parking requirements or establishing maximums. The theories on which the claimed benefits are based assume a transportation system that is far more robust than the transportation system available in DC.*

Compared to similarly sized cities around the country, DC has an incredibly robust transportation system. Moreover, there are plans in motion to greatly increase alternate modes of travel throughout the city including a new light-rail system, increased connector bus service, new express bus routes, 8-car Metrorail service, and significant improvements in designated bicycle routes, including large increases in the number and mileage of striped bicycle lanes.

- *I think your analysis is right on, in fact the parking requirement often hinders mixed use development projects: retail with residential or Commercial /Residential, because of the cumulative requirement of parking, the cost associated and the land area required plus no matter of right ability to share spaces based on time use between functions- Too often retail is removed on C zoned areas because parking required makes it impossible, the outcome is a single use built.*
- *Many of the jurisdictions cited in the Nelson/Nygaard report have parking minimums that are significantly higher than the District's current parking minimums. To the extent that there might have been any reductions for projects near Metro, some of the reduced minimums are multiples of DC's current parking minimums.*

The Nelson/Nygaard study does not suggest that the District should comprehensively copy the practices of any city described in the report. Rather, the study shows a growing shift across the nation away from parking minimums as cities realize the hidden costs of over-parking. The recommendations address many of these costs facing the city, including increased traffic, rising housing costs, and the physical disruption of existing pre-parking neighborhoods. The recommendations take advantage of the lessons learned by these other cities, while taking into account the unique characteristics of the District, including our world-class transportation system, the high cost of land, and the historic fabric of our successful neighborhoods.

- *C-1 (Low density neighborhood commercial) uses should not have parking minimums.*

The advertised recommendation was to maintain minimums for all non-residential uses in low and moderate density residential zones. This comment rightly recognizes that the largest parking impact in these zones comes from institutional uses rather than the C-1 commercial uses. Many neighborhood stores in C-1 zones do not have the lot area for parking and serve only neighborhood residents, while institutional uses tend to serve wider areas and have larger impacts. OP is open to changing the standard to providing minimums for only institutional uses in low and moderate density residential zones.

Remaining Issues

OP will continue to examine appropriate standards for any minimum requirements that will be maintained. OP suggests converting the formulae to a square footage standard rather than one based on employees or other measures of users. The conversion could be done to maintain similar requirement levels while allowing easier interpretation and enforcement of the requirements.

2. PARKING MAXIMUMS

Existing Practice

The existing regulations do not provide any cap on the total number of parking spaces that can be built for any use in any zone.

Issue

Current parking standards do not reflect the traffic and parking policies of the city or the Comprehensive Plan. Many of the city's traffic management and transportation goals cannot be accomplished without some targeted caps on parking provision.

Recommendation 2

The regulations should apply parking maximums as a general rule to further the city and Comprehensive Plan goals. Maximums could be applied across the city, but would be most applicable and stringent around transportation hubs and in the downtown. Maximum limits would be discussed and proposed during each of the working group processes for individual land use categories.

Analysis

The establishment of limits on accessory parking for new development represents a paradigm shift in the focus of zoning requirements for parking. The previous emphasis on parking minimums as a way to reduce local congestion and parking shortages surrounding new development has frequently resulted in parking oversupplies that, ironically, induce auto trips and greatly increase congestion on a regional scale. This micro-level focus also virtually ignores potential impacts of over-parking development on housing costs, urban design, community and

economic development, and levels of service for pedestrians and transit users. Parking maximums, by contrast, emphasize managing the impact of auto trip generation on local, city, and regional scales — and explicitly favor a balanced, multi-modal approach to development access.

The Comprehensive Plan speaks in several places about managing traffic and parking demand. The current strategy of limitless parking availability provides no means to control the demand for parking, but rather incentivizes auto travel and continually creates more parking demand.

This analysis is presented in further detail in the May 2008 parking report completed for the Office of Planning by Nelson/Nygaard consulting associates.

Comments and OP Response

- *The case of instituting parking maximums is a public interest issue as the government seeks to reduce unnecessary traffic generated by subsidized parking and fully utilize public investments in transit and other public infrastructure (sidewalks, bicycle facilities). Too much parking undermines these public investments and fails to connect the user with the true cost of building and maintaining parking (parking charges rarely recover the cost – which means everyone subsidizes the driver). If the user of parking paid more of the actual cost of parking, less parking would be demanded. When parking is free – or 4 cents a day, as is the case for RPP – many higher density neighborhoods have strong demand for parking.*

OP agrees with this assessment.

- *Refining these maximum requirements will need to recognize all Metro stations are TOD areas, but also recognize that all are not the same and will need to be defined differently as discussed in the Comprehensive Plan – reflecting the character of the surrounding neighborhood, while also recognizing the value of the transit access to the city and region.*
- *How will the maxima in P.2.5 be determined?*

Parking maximums will be determined separately for each of the land use groups in the Zoning Update. The Downtown, Commercial Corridor, Medium/High Density Commercial/Residential, and other land use groups will each discuss and recommend an appropriate parking maximum for these areas.

- *Where TOD exists, developers should be encouraged to build less parking, not more.*

OP agrees with this statement.

Remaining Issues

Parking maximums will be recommended individually by land use category.

3. SHARED PARKING

Existing Practice

There are currently no provisions (with the exception of C-4 districts) in the regulations to allow or incentivize uses to share parking facilities.

Issue

The Comprehensive Plan stresses the encouragement of shared parking and improved management of parking facilities to increase efficiency and reduce the need for increase parking supply.

Recommendation 3

Two or more non-residential uses within 400 feet of existing or proposed parking may share required parking provided:

- (a) The request is accompanied by a signed agreement between the owners of both uses confirming shared use of parking for a period of no less than ten years and submitted to the Zoning Administrator;**
- (b) The uses have different time of day requirements for parking and the distribution of spaces by day of the week and time is clear in the agreement;**
- (c) A parking study showing no negative impacts is submitted;**
- (d) The applicant shall negotiate the renewal of any agreement prior to its expiration and provide copies of the agreement to the Zoning Administrator; and**
- (e) The applicant shall immediately notify the Zoning Administrator either before any amendment to or upon termination of the agreement.**

Analysis

Required parking spaces for all uses in all districts need not be limited to use by residents, employees, occupants, guests, visitors, or customers of such uses, but may often be efficiently used also for general public parking. This is a change from the current regulation that allows such an option only for “office and retail or service uses” and only in C-4 districts.

Promoting car-sharing is one of the most important steps a city can take in reducing demand for accessory parking. Currently, there are thousands of parking spaces in DC that are only used for limited hours of the day or days of the week. For example, thriving entertainment districts often contain office or retail buildings with parking structures that are closed at night.

OP will continue to work with DDOT on non-zoning strategies to efficiently manage the city’s parking supply; however the zoning regulations should allow for and encourage uses to share parking supply when possible.

Comments and OP Response

- *Allowing and encouraging shared parking is desperately needed. Arlington County has been very successful at this, as have many other jurisdictions. Shared parking is the urban approach to parking. Separate parking for every use is the suburban and inefficiently and highly costly approach to parking.*
- *Is this an opportunity to address the church parking issues where parishioners double park on Sundays? There are many neighborhoods that need help working this out. I don't think this is a situation where we can expect people to take public transportation, and many of the vehicles come from outside of the city.*
- *I fully support the provisions for shared parking. Allowing and encouraging shared parking is desperately needed. Arlington County has been very successful at this, as have many other jurisdictions. Shared parking is the urban approach to parking. Separate parking for every use is the suburban and inefficiently and highly costly approach to parking.*

4. RELIEF FROM PARKING MINIMUMS AND MAXIMUMS

Existing Practice

With the exception of some downtown Metro stations and zones, the existing regulations require variance relief from parking requirements even where parking is not needed or is impossible to provide.

Issues

The current situation results in many unnecessary variances and provides no opportunity for developers to question the need for parking spaces on many sites that are well served by other transportation modes.

Recommendation 4

A development may provide up to 50% fewer parking spaces than the minimum required provided that a contribution at the rate set by DDOT is made to a DDOT transportation fund for every space under the limit.

A development may provide up to 50% more spaces than the maximum allowed provided that a contribution at the rate set by DDOT is made to a DDOT transportation fund for every space over the limit.

The fund for these contributions would be set up, maintained, and controlled by DDOT. The rate suggested by the Nelson/Nygaard report would be roughly at 20% less than the cost of a parking space.

Development may only deviate from the required number of spaces by more than 50% when approved as a variance. The required contribution still applies to the first 50%.

Analysis

The provision of parking is generally well incentivized by the market and most developers exceed the current requirements by choice. The main two reasons that parking would not be provided in adequate amounts would be that the site constraints do not allow for parking, or that by virtue of the type or location of the project parking is not needed and would not be used.

The existing variance process only allows relief from parking requirements for the former reason. The variance procedure looks at physical site constraints and does not currently provide allowance for businesses or residences to prove a lack of parking demand.

The recommendation would provide a matter-of-right option for developers to develop less than the required parking (or more than the maximum parking). This option would be tied to a payment into a transportation fund managed by DDOT. This payment would be set at a level comparable to the price of providing the parking itself as a way to discourage non-compliance with the standards unless it is deemed necessary.

Comments and OP Response

- *Difficult to follow and not easy to understand what the goals and anticipated outcomes were. I did find myself wondering what the impact on surrounding neighborhoods would be if developers started deciding to pay into the DDOT fund instead of constructing all of the required parking.*
- *This recommendation allows a property owner to buy its way out of providing the minimum required parking. If public policy as embodied in the Zoning Regs says that something is required, then it's required and people should not be able to pay the city off to ignore public policy. If a property owner can convince the government (DDoT, BZA, whomever) that the required parking isn't necessary in a particular case, then the rule should be waived without requiring payment.*
- *This recommendation does not offer District residents an opportunity to present their concerns to, for example, the BZA about a request for a reduction of up to 50% in the number of parking spaces required and does not provide residents with assurance that DDOT will be carefully evaluating the impact of the requested flexibility on the District's neighborhoods.*
- *Provides for a property owner to pay the city to allow him to provide more than the maximum permitted parking. But a property owner should still be required to show a need for the extra parking spaces.*
- *No "contribution" should be required from an owner who satisfies the variance standard for providing less than the minimum required parking.*
- *Support DDOT review & fee in lieu of required parking minimum or maximum.*

Such alternatives proposed in BZA cases for parking reduction, but the BZA did not believe it was in a position to require any such programs, and simply relived the developer of parking requirements worth possibly a million or more dollars.

OP understands the concern expressed in many of these comments. The proposal would actually provide a disincentive to failing to meet the parking requirements by requiring payment for such flexibility. Developers with a choice of paying to provide parking or paying a similar amount to not provide it, will generally choose to have the value of the parking space whenever it is possible. OP is open to the argument of not requiring the contribution where a variance procedure shows that it is physically impossible to provide parking.

- *Consider abolishing ban on parking reduction if property is within radius of Metro regardless of adjacent residential use.*
- *Current law allows for special exception relief from parking requirements. Why the change to variance?*
- *The new regulations should be very explicit about what is allowed by special exception and then consider everything else as a variance.*

The proposed recommendation appears to solve these comments. It would allow reduction near Metrorail stations regardless of adjacent use, it would eliminate the need for either a special exception or a variance for the first 50% of parking requirement, and it would explicitly require a variance for a reduction greater than 50%.

5. CAR SHARE SPACE REQUIREMENT

Existing Practice

There are currently no provisions for parking spaces dedicated to car-sharing entities. The provision of such spaces would have to be above and beyond required parking minimums.

Issue

The existing practice should encourage and provide for car-sharing spaces.

Recommendation 5

Any development proposing new parking with 50 or more spaces shall make parking spaces available to any car-share entity at the rate of one space plus one for every 100 spaces over 50. Spaces shall be available in perpetuity to any car-share entity with 90 days notice. Car-share spaces would not count against any maximum parking requirement.

Analysis

This recommendation would make car-sharing spaces available in large parking lots throughout the city and help to encourage the use and availability of this service. Car-sharing services like Zipcar provide a proven urban alternative to car ownership.

OP recognizes that many of the spaces provided under this requirement would never be utilized by car-sharing services, but the intent of the requirement is that they would be available in perpetuity in order to accommodate changing trends in car ownership.

Comments and OP Response

- *The Zoning Regulations should not be used to require developers, building owners and condo owners to subsidize a private car-sharing company.*

The proposal would not be limited to private companies. Some cities actually have public or non-profit car sharing services. The recommendation was intentionally worded to allow for this possibility in DC.

- *There has been no research to demonstrate any benefit from requiring developers and building owners to provide this subsidy. ...This subsidy has not been justified. If the proponents of this change can provide such a justification, it should be pursued through other channels, not through adding language in a zoning update process.*

This practice has been successfully implemented as a zoning regulation in other cities. Arlington currently has a very similar program requiring the availability of car-sharing spaces in its zoning code.

- *Allow car-sharing to not counting against a maximum.*

This is part of the recommendation.

- *Car-sharing spaces allowing a decrease in parking space requirements.*
- *Recommend also allowing car-sharing spaces & vehicles to count for 4-5 individual parking spaces where minimums are required (or a conservative estimate of the number of private ownership cars typically reduced by a carsharing vehicle).*

OP is open to the recommendation that provision of car-sharing spaces would also allow a decrease in minimum parking required.

6. PARKING SIZE REQUIREMENTS

Existing Practice

The regulations currently provide standards for the size of parking spaces and aisles. These requirements are not always consistent with other government standards.

Issue

The zoning regulations should be consistent with other government standards for parking space and aisle measurements.

Recommendation 6

Update parking space standards to match current DDOT and ITE standards.

Allow 50% of parking spaces in any lot to meet compact standards and remove the requirement that these be grouped together.

Automobile parking shall meet the size requirements of the following tables, exclusive of access drives, aisles, ramps, columns, and office or work areas. Parking shall also be in compliance with the requirements of the Americans with Disabilities Act.

Table I: FULL SIZED CAR SPACES

Parking Angle	Stall Width (Feet)	Depth of Stalls Perpendicular To Aisle (Feet)	One-Way Aisle Width (Feet)	Two-Way Aisle Width (Feet)
45°	9	17.5	12.0	N/A
60°	9	19.0	14.0	N/A
90°	9	18.0	16.0	24.0
Parallel	22.0	8.0	12.0	24.0

Table II: COMPACT CAR SPACES

Parking Angle	Stall Width (Feet)	Depth of Stalls Perpendicular To Aisle (Feet)	One-Way Aisle Width (Feet)	Two-Way Aisle Width (Feet)
45°	8	16.5	12.0	N/A
60°	8	17.0	14.0	N/A
90°	8	16.0	16.0	24.0
Parallel	20.0	8.0	12.0	24.0

Analysis

The recommended standards are not a significant change in size from the existing regulations; however, they provide more guidance on the provision of angled spaces and directly reflect ITE standards.

The changes to allow compact spaces not to be grouped would eliminate a common variance request and provide flexibility to developers of parking lots to provide more efficient spaces.

Comments and OP Response

- *The recommendation allows a parking area or garage to designate up to 50% of the parking spaces for compact cars. Why this limit? Isn't the policy to encourage compacts, or at least not to encourage large cars?*

While the Comprehensive Plan encourages non-automobile travel, there is no policy and was no discussion in the working group of discouraging large cars through parking space size.

- *Currently the regulations call out 90 degree parking and then angled parking. How come we are proposing to specifically call out 90, 60, and 45 degree parking.*

The 60 and 45 degree parking spaces are measured differently. The more angled the space, the more wasted space there is at the front of the car. In order to provide the same amount of depth across the entire width of the space, 60 and 45 degree spaces need to be measured differently.

7. ACCESS TO PARKING SPACESExisting Practice

Parking areas need only be directly accessible from any public right-of-way. No distinction is provided between streets or alleys.

Issue

The existing requirements do not prioritize access in such a way to encourage parking off of alleys or secondary streets. Parking requirements can occasionally come into conflict with DDOT policy on curb cuts or access.

Recommendation 7

Where an improved alley exists, all parking spaces shall be accessed from the rear of the building through an improved alley.

If the building does not have alley access then parking spaces shall be accessed from a secondary street [the distinction between primary and secondary streets would be done by DDOT and should be made available to the public].

If the building does not have alley or secondary street access then parking spaces may be accessed from the front of the building provided that the D.C. Department of Transportation grants permission for a curb cut from the adjacent street. Standards for the distance of these entrances from intersections should match current DDOT standards.

Parking spaces need not be provided if adopted public law, municipal regulation, or the D.C. Department of Transportation prohibits a curb cut on the street that the lot faces and there is no other alternative access to the lot through a street or alley.

The minimum distance between parking entrances and intersections should be increased to match existing DDOT standards.

Analysis

Good urban design principles would generally have parking areas accessed from the rear of a structure. Especially along major corridors and downtown, the pedestrian environment is negatively impacted by parking entrances. This recommendation is intended to require access from alleys where they are available and sufficient. On corner or through lots without alley access, the parking access should be on the secondary street where one is available. This would serve to protect the pedestrian environment on primary streets. OP will work with DDOT to further define these terms.

Also, the existing regulations can create conflict between the requirements of zoning and DDOT. Where parking is required but DDOT policy would not otherwise allow a curb cut, the only solution is either for the applicant to request a variance or for DDOT to compromise their standards. This recommendation would remove the onus from DDOT to compromise their standards when there is a conflict with the parking requirements.

Comments & OP Response

- *How do we setback appropriately for a building that allows 100% lot occupancy and abuts an alley that is only 10' wide?*

The regulations will need to include standards for the minimum clear width necessary to accommodate automobile ingress and egress.

- *Why are we increasing [the minimum distance between a parking entrance and an intersection] from 25' to 60'? Can we anticipate any difficulties?*

This change reflects the DDOT standards for the appropriate minimum distance.

Remaining Issues

- DDOT designation of streets
- Definition of “improved” alleys
- Minimum passageway for alleys to be usable by vehicles

8. LOCATION OF PARKING SPACES

Existing Practice

Parking not within a building is currently allowed to be located in any rear or side yard with no requirement that it be visibly separated from streets.

Issue

Loading is traditionally a back-of-house function and, when not properly separated from the streetscape, can have negative effects on urban design and aesthetics of an area.

Recommendation 8

All surface parking spaces shall be located as follows:

- a) to the rear of the principal building [within a rear yard]; or**
- b) within a sideyard, provided that the parking spaces are screened so as to not be visible from public right-of-way.**

No parking spaces shall be located between a building face and a lot line abutting a street.

In the case of a corner lot, no parking spaces shall be located in the side yard opening onto the street that has the higher DDOT classification. Where both streets have the same classification, parking may face either street, but not both, and must be screened so as to not be visible from the right-of-way.

Analysis

In the denser parts of the city, parking areas are generally enclosed within buildings. This recommendation is tailored toward those parts of the city where parking functions are more commonly located outside and adjacent to the buildings. This recommendation is intended to preclude parking in areas adjacent to and visible from the street. The recommendation would prioritize outdoor parking in the rear of the building and require screening from public right-of-way where that is not possible.

Comments & OP Response

None

9. PARKING LOT TRASH RECEPTICLESExisting Practice

There are currently no requirements to keep surface parking lots free of refuse or to provide trash receptacles.

Issue

The current regulations do not allow for enforcement of cleanliness or maintenance standards for parking lots.

Recommendation 9

The parking lot shall be kept free of refuse and debris. Parking areas serving retail uses and restaurants shall provide at least one outdoor litter receptacle within the parking area.

Analysis

The recommendation would provide a zoning standard for maintenance of surface parking lots.

Comments & OP Response

None

10. PARKING LOTS LANDSCAPING REQUIREMENTS**Existing Practice**

The regulations currently require that open parking spaces provide landscaping on 5% of the surface area of the lot.

Issue

The existing regulations provide for only a minimum landscaping standard and provide no shading or canopy coverage requirements.

Recommendation 10

Any surface parking with six (6) or more spaces should be subject to the following landscaping and screening requirements:

- (a) Landscaping should cover a minimum of ten percent (10%) of the total area devoted to parking, including aisles and driveways. The landscaping should be maintained in a healthy, growing condition.**
- (b) General canopy coverage will be required for the lot. OP will work with Casey Trees to set standards that result in approximately 30% canopy coverage and incentivize existing trees. In general, this will result in about one tree for each five parking spaces.**
- (c) All newly planted trees must have a minimum caliper size of 2.5 inches and must be planted in a space that provides a minimum of 500 cubic feet of soil volume per tree.**
- (d) In order to prevent injury from vehicle bumpers, trees should be planted a minimum of four (4) feet from any protective barrier, such as curbs or wheel stops. When landscaped areas are located adjacent to vehicle overhangs, all attempts should be made to plant trees in line with the side stripes between parking spaces.**

- (e) All end islands of parking rows and all areas otherwise not used for ingress and egress, aisles and parking must be landscaped.**
- (f) Parking spaces should be screened from all contiguous residential property located in low & moderate density residential zones by a solid brick or stone wall at least twelve inches (12 in.) thick and forty-two inches (42 in.) high or by evergreen hedges or evergreen trees that are thickly planted and maintained and that are at least forty-two inches (42 in.) in height when planted.**

It is anticipated that the Sustainability working group will examine stormwater runoff standards that could be applied to surface parking lots.

Analysis

There is a clear need in our zoning regulations for a greener treatment of our surface parking areas. The urban heat island effect is greatly exacerbated by large areas of surface asphalt including parking lots. This impact can be greatly diminished through the use of shade trees in and around these areas.

The existing regulations provide minimal green space and no requirements for tree coverage. The proposed requirements would provide approximately 30% tree canopy coverage of all new surface parking lots. Working with Casey Trees and the working group, OP has determined that this can most easily be implemented through a direct ratio of one tree per five parking spaces.

OP recommends that the standard be further focused to provide extra credit for saving mature trees and reduced credit for trees that only partially shade the site. OP will continue to work with Casey Trees to set write clear and usable standards based on this recommendation.

Comments & OP Response

- *How can parking be accommodated on small lots with increased landscaping... Currently our regulations require 5% landscaping on parking areas that provide more than 10 spaces. During my limited time on the Board I've seen several applications that struggle to conform to this requirement given the number of units proposed and the required size of parking spaces and drive aisles. The proposed language is now increasing the amount of landscaping from 5% to 10% and decreasing to threshold from 10 spaces to 6 spaces. Also, because we are now requiring canopy trees and preferring them to be located on the perimeter and interior of the lot we are requiring some "stand off" distance from the trees so they are protected. I suspect this is going to increase the average amount of land area that is necessary to accommodate the required parking.*

OP will attempt to provide graphics prior to the public hearing to show how the landscaping requirements can be accommodated even on small lots.

Remaining Issues

OP will design a system of reduced credit for trees partially covering the lot and extra credit for retaining mature existing trees.

11. BICYCLE PARKING

Existing Practice

Bicycle parking is currently required only for retail, office, and service uses. Bicycle parking must be provided equal to five percent of the automobile parking spaces.

Issue

The current standards do not reflect the city's current commitment to bicycle riders nor do anything to encourage bicycle ridership.

Recommendation 11

Bicycle parking should be provided for all new structures in the District above nine residential units or 5,000 square feet of commercial use.

Both interior and exterior spaces should be regulated. Class A spaces are interior spaces for residents, employees, and other long-term users of the site. Class B spaces are outdoor spaces for visitors, customers, and other short-term users of the site.

OP would adopt the size and space requirements proposed by Nelson/Nygaard for the location and provision of required spaces.

In addition, OP recommends that non-residential uses greater than 50,000 square feet that require Class A spaces should also provide shower facilities for bikers. This would include one shower per gender for each 50,000 square feet as well as locker space equal to 30% of the required Class A spaces.

The suggested bicycle requirements are on the following table. This chart will likely need to be amended prior to final adoption to reflect the uses or categories of uses ultimately adopted by the Zoning Commission.

Use Categories	Specific Uses	Required Bicycle Parking	
		Class A	Class B
Residential (9 or more units)	Multi-Unit Dwelling	1 for each 3 units	1 for each 20 units, min 2
	Community-Based Residential Facility	1 for each 20 residents, min 2	None
	Campus-Affiliated Housing not approved as part of campus plan	1 for each 8 residents	1 for each 20 residents, min 2
	Publicly Assisted Housing	1 for each 3 units	1 for each 20 units, min 2
	Rooming or Boarding House	1 for each 3 bedrooms, min 2	None
Commercial (5,000 SF of GFA or greater)	Office	1 for each 10,000 SF of GFA, min 2	1 per 40,000 SF of GFA, min 2
	Retail/ Service	1 for each 10,000 SF of GFA, min 2	2 for each 5,000 SF of GFA
	Dining and Entertainment	1 for each 10,000 SF of GFA, min 2	1 for each 10,000 SF of GFA, min 2
	Hotel or Inn	1 for each 10 hotel units	2 for each 50 hotel units
	Parking	None	1 for each 20 auto spaces, min 10
	Outdoor Recreation	None	1 for each 20 auto spaces, min 10
Industrial	Manufacturing	1 for each 15,000 SF of GFA, min 2	None
	Warehouse and Freight	1 for each 40,000 SF of GFA, min 2	None
	Non-Accessory Parking	None	1 for each 20 auto Spaces, min 10
Institutional	Transit Centers	None	8
	Park and Ride	None	1 for each 20 auto spaces, min 10
	School - K-5	1 for each classroom	1 for each classroom
	School 6-12	1 for each classroom	1 for each classroom
	Colleges	Per campus plan	
	Hospitals	1 for each 70,000 SF of GFA, min 2	1 for each 40,000 SF of GFA, min 2
	Houses of Worship	None	1 for each 10,000 SF of GFA, min 2
	Daycare	None	1 for each 5,000 SF of GFA, min 2

Analysis

The City Council has recently passed legislation that would require bicycle parking throughout the city. This recommendation would carry this policy into the zoning regulations and formalize the requirement for new developments to provide this service.

The recommendation changes the requirement to be based on the use rather than the number of automobile parking spaces. This will allow for the consistent provision of bicycle parking even where automobile parking is not available.

Comments & OP Response

- *Standards should reflect DDOT's standards.*

DDOT has been involved in the creation and review of these standards.

- *Bike Parking should be part of Campus Plan process for colleges*

Campus Plans for colleges and universities will be the subject of a separate working group. This recommendation will be a part of that discussion.

- *Offering higher quality bicycle parking is part of the city's effort to reduce traffic, and increase non-polluting and more community-friendly travel modes.*

Attachment:

- 1) Work Group and Task Force Comments.

ATTACHMENTS

WORK GROUP AND TASK FORCE COMMENTS

TO: Travis, Karen, and Maxine; Parking and Loading Working Group

FROM: Nancy MacWood

DATE: April 2, 2008

RE: Proposed Zoning Changes for Parking and Loading

Some of the recommendations by Nelson/Nygaard are incorporated into the proposed regulations, but some are not specifically zoning and are aimed at DDOT. Some of them raise concern so I want to briefly mention a few because they may be used as the basis for pilots. There is discussion about RPP and how it is functioning and how it could be improved. There is a misperception at NN about RPP. It is not reducing parking demand in any part of the city where parking demand is historically high. The geographic boundaries of the program almost guarantee that it will not reduce demand. The NN suggestions of marketing the stickers or basing numbers of stickers per household on the owner's street frontage are not worthy of consideration. The market approach is regressive and unfairly impacts lower income residents, the street frontage solution is equally inequitable (I would be eligible for multiple stickers whether I need them or not, but my neighbor would be eligible for fewer) and has no relationship to any public policy goal. This entire section of recommendations should be considered within the District context and then hopefully shelved.

The brief TOD discussion revolves partly around applications of RPP, but it is worth noting that there seems to be a misperception of how TOD is intended to operate in the District. The Comp Plan clearly states that the "reach of TOD around any given station or along a high volume transit corridor should vary depending on neighborhood context...applying a uniform radius may not be appropriate in the District." Yet NN recommends that the TOD overlay district be defined as all areas within ½ mile (as opposed to the Comp Plan's ¼-1/2 mile) of a metro station. This is the one size fits all approach that the Comp Plan sought to avoid. The NN report goes on to say that RPP in TOD overlay areas should be subject to the market or the property based limits mentioned above. This suggestion avoids the real issue which is that there are too few on-street spaces for the residents who live near metro stations where metro does not provide parking (and this includes most of our metro stations) and the RPP allows too many drivers to park in too large an area, including on streets adjoining metro stations. RPP boundaries should be reduced and there should be resident-only parking near metro or rush hour resident only parking in these areas. Residents have complained for a long time that RPP is not fulfilling its promise partly because it is not well enforced or enforcement is targeted to the wrong areas and partly because its reach is too broad; the consultants have a misperception that it is successfully addressing the spillover parking issues.

Parking

P.1.9 relies on compliance with public space standards which should be published in the regulations or referred to if they are published in another part of zoning regulations. There shouldn't be confusion about what is required.

P.2.1 provides new minimum parking requirement formula for non-residential uses in all residential zones up to R-5-B based on square footage. It is unclear how this would work for institutional uses in these districts which currently are subject to a different formula. OP should provide more information about the reason for the change and impact. There are no minimum requirements for residential uses beyond R-1 and R-2 unless a multi-unit residential building is within 400 feet of low or moderate density zone. This is presumably to prevent spillover parking situations. There is R-5-B and R-5-D spot zoning bumping up against R-1 districts in my ANC area, which is not near metro, so some assurance of additional parking capacity is needed. I think it would be helpful to use maps to determine where there could be teardowns and infill or where there is vacant land abutting established neighborhoods to determine where this proposed regulation would apply and whether it is adequate to meet the intent of preventing spillover parking or worsening of an historical pattern of demand exceeding supply.

P.2.3 allows BZA to reduce required number of parking spaces based on stated criteria, but then has a catch-all phrase "or any other standard applicable to the use set forth in the regulations." This is too vague and open-ended. The standard should be spelled out so that there is predictability and transparency.

P.2.4 doesn't list the parking numbers so I can't comment on the proposed maximum parking requirements, but the NN discussion raises some concerns about whether these are appropriate in the District at this time. NN cautions that these requirements have a dampening affect on development and shouldn't be used when development demand isn't high or in locations where development is difficult to attract. Given the softening of the real estate market, is this a good time to interject this requirement and isn't the focus of development on the areas of the city where development has historically been difficult to attract? The proposed chart indicates that there is no attempt to target the maximums, but rather to apply them uniformly across medium to high density residential, all commercial, and industrial districts. When they are used, NN recommends that the maximum levels be targeted according to use and the goals of the zoning regulations, which in the District context should be the Comp Plan, as well as a general sense of the development market. It would have been helpful if NN had expanded on these concepts, but I question whether we have enough experience from other cities to draw upon and whether we currently, and for the near future, have the rosy profile needed to sustain citywide maximum parking requirements..

P.2.6 waives car sharing spaces from max requirements. Are they also not included as part of minimum requirements?

P.3 has an abundance of unclear provisions and should be carefully rewritten and in part reconsidered.

P.3.1 allows shared parking for multiple users but doesn't state the relationship of users to the existing or proposed parking facility. It is unclear who has to own the parking facility. Subsection (a) doesn't include an agreement to use a parking facility if it is not owned by one of the users. Subsection (c) requires a parking study showing no negative impacts but doesn't require any analysis to determine if the submitter is correctly stating the facts — Why would anyone submit a parking study that showed negative impacts? The parking study is to be submitted to the Zoning Administrator, but there is no direction about what the ZA does with it. I assume this is because the OAG has opined that Zoning Commission can't instruct the ZA to do anything. Without some instruction, this provision in its entirety is pretty worthless in terms of protecting the public.

P.3.2 trades additional or reduced parking allowance for money into DDOT coffers. It is applied to any development, but this term is undefined and there is no clarity about whether this provision would apply to residential, commercial, institutional, or other or all of them. The current regulation, I believe, allows for some flexibility for non-residential requirements. The suggested contribution rate is enormously high, so I assume OP doesn't expect any but the richest developer of the most high end property to use this provision. From a policy perspective, it is difficult to see how paying to avoid complying with minimums is consistent with the rationale for minimums, which is to avoid spillover and be sensitive to historic neighborhood parking problems.

P.3.4 allows a developer (in what zone district?) to seek a variance for deviating more than 50% from the parking requirements. If a developer can meet area variance standards for maximums, which is difficult to imagine, then why are they penalized by requiring them to pay into DDOT coffers for the first 50% deviation? While the BZA has existing authority to waive minimum parking standards, the new rationale for minimums seems inconsistent with the ability to reduce them and thus, a waiver shouldn't be possible. If development can't meet minimum parking requirements then perhaps OP should be discouraging it because more than likely it is a PUD development that can be reconceived.

P.3.5 is poorly worded because it appears to give DDOT authority to review variance relief, when what was intended is more likely comment before final action is taken by BZA.

P.3.6 requires a parking study in certain circumstances but it doesn't say where it is filed and who reviews it, if it is reviewed at all. Why isn't a parking study triggered by a variance application or when a developer seeks to increase or reduce the parking requirements? In that instance, a developer simply pays what amounts to a tax regardless the impact of that decision.

P.3.7 lists the contents of a parking study, but doesn't define the study area or indicate what information is intended to be provided from the site survey. Subsection (c) seeks

information about the quantity of existing public (not curb), commercial or private parking in the neighborhood, but doesn't define a reasonable area or require evidence that any of these spaces could actually be used. Subsection (d) asks for information about proximity to metro or public transportation but again doesn't define an area where this information would be relevant.

P.4.1 provides a chart that reworks Section 2115 through 2117.6 in the existing zoning regulations. Can you explain why the depth of parking stalls deviates from current regulations? For example, the current length for a full sized car is 19 feet and this dimension is carried over for spaces at a 60 degree angle. All other space lengths for full sized angled car parking are less than currently required. But for a compact car, the current standard of 16 feet is the least space required for any angled parking in the proposed regulations. Also, the dedicated aisle width appears to be less than is currently required. Is this the case, and, if so, why is that?

P.6.1 presents acceptable locations for surface parking regardless of zone district, but doesn't address how a side yard or rear yard is determined. Since developer can choose the front yard location for purpose of allowable height will this determination be the basis for establishing the side and rear yard?

P.6.2 prohibits parking between building face and lot line, but doesn't address how requirement would work if there are multiple buildings, ie., private schools or hospitals, on the lot.

P.6.5 gives BZA authority to impose conditions on parking spaces when it has waived any provisions of 6.1 through 6.3. Section 6.3 requires screening and this should not be waived because the BZA is not required to insert it as a condition. Screening should be non-negotiable.

Comments on proposed Parking code revisions

By Cheryl Cort

April 3, 2008

Overall, I strongly support this effort and these proposals. They are in line with the many discussions that we have had as a city – the Mayor’s Task Force on TOD, the Mayor’s Parking Task Force, the Comprehensive Plan, Inclusionary Zoning, the performance parking projects in Ward 6 and Ward 1.

I appreciate the thoughtful report from NN reflecting our series of work group discussions and NN’s recommendations to bring our parking code into the 21st century. I am fully support devising an RPP system to manage public curbspace to address the needs of residents, visitors and businesses while also accomplishing other important public goals. The public goals of effectively managing parking, reducing conflicts and ultimately not adding to the supply of parking include: reducing traffic, enhancing the pedestrian and bicycling environment, improving bus operations, reducing pollution, reducing the cost of housing and commercial space, supporting local businesses through a strongly pedestrian-based customer base. Given that parking supply on and off street are related and effect the pricing and demand for parking and alternatives, it is appropriate that this group discussed these questions together and largely agreed that off-street parking requirements are moot if on-street parking is managed to the satisfaction of residents.

Specific Comments:

Where to we require the unbundling of parking costs from buying or renting living or working space? This is a critical variable to right-sizing parking, because it eliminates cross subsidies. It’s much fairer to have the buyer buy exactly how much parking he is willing to pay for. Currently, we all pay for private car storage through higher housing and retail costs.

P.1.1 I suggest replacing this language and using the NN language that presumes no minimums and maximums unless otherwise specified.

P.2.1 Minimum Parking Requirements

I support allowing minimums for low density residential uses. I agree that C1 should not have parking minimums.

Regarding lumping R-3 - R-5 with R-1 and R-2 for the 400 foot buffer for multi-family housing and commercial space – I think this is inappropriate but am willing to accept it if the other provisions in this chapter are retained.

P.2.4 Maximum Parking Requirements

I recognized that this will be allied in higher density mixed use and transit areas where it is appropriate for the government to place a restriction on the private sector for the public good of

utilizing public investment in transit, walk, bike and other facilities, and in other goals such as reduced housing and commercial costs.

Refining these maximum requirements will need to recognize all Metro stations are TOD areas, but also recognize that all are not the same and will need to be defined differently as discussed in the Comprehensive Plan – reflecting the character of the surrounding neighborhood, while also recognizing the value of the transit access to the city and region.

P.2.6: I support allowing carsharing not counting against a maximum. I recommend also allowing carsharing spaces & vehicles to count for 4-5 individual parking spaces where minimums are required (or a conservative estimate of the number of private ownership cars typically reduced by a carsharing vehicle).

P. 3 I fully support the provisions for shared parking. Allowing and encouraging shared parking is desperately needed. Arlington County has been very successful at this, as have many other jurisdictions. Shared parking is the urban approach to parking. Separate parking for every use is the suburban and inefficiently and highly costly approach to parking.

P. 3.2 & P3.3: I fully support DDOT review & fee in lieu of required parking minimum or maximum. I would expect this to be tens of thousands of dollars per space. I also suggest that an on-site Transportation Demand Management program approved by DDOT also be an option. Such a program could include SmarTrip cards, ongoing transit fares to building occupants, more carsharing vehicles, car sharing memberships and discounted use for building occupants, a bicycle program that promotes the use of bicycles for daily activities, etc. I have proposed such alternatives in BZA cases for parking reduction, but the BZA did not believe it was in a position to require any such programs, and simply relived the developer of parking requirements worth possibly a million or more dollars.

P.5.6: Zoning should do its part to minimize the intrusion of private vehicle uses across the public sidewalk and the reduction of on-street parking. Thus I recommend allowing only one-way driveways with a maximum of 14 feet. An exception process can be offered where more driveway access can be justified, but justifying should be based on larger sized buildings, highly driving oriented uses that are permitted, or needed access for larger trucks.

P.6.4 For BZA consideration of approving parking spaces located somewhere else add: less negative impact on pedestrian facilities.

P.6.9: see my comments for P.5.6

BP.2: I support the improved bicycle parking requirements here, though cannot speak to the details. Offering higher quality bicycle parking is part of the city's effort to reduce traffic, and increase non-polluting and more community-friendly travel modes.

Parking Comments from Allen Greenberg

From: agcatp2@aol.com

Sent: Friday, April 04, 2008 4:30 PM

Subject: Parking and Loading Work Group Final Draft Comments from Allen Greenberg

Thank you for convening the essential process to examine parking requirements in the context of the new District Comprehensive Plan. Participants, I am sure, are aware of my view that if on-street parking were aggressively managed, and pricing and regulations were instituted to ensure that demand for on-street parking not exceed supply, then off-street parking requirements would not be needed. If we reached this point, there would be enormous public benefits, including substantially more affordable housing and fewer cars (leading to less pollution, fewer accidents, additional financial savings, etc.).

The draft Nelson\Nygaard technical memorandum and proposed Vehicle Parking Chapter move in the right direction by acknowledging that, at least in some instances, minimum parking requirements are unadvisable and, to the degree that they continue to exist in some form, alternative compliance strategies such as shared parking and payment in lieu of providing parking should be allowed.

Regarding the technical memorandum discussion about residential parking permits (RPP), there is much to like, but the proposed recommendations themselves could be improved. One commenter recommended decreasing the size of RPP zones so as to curtail driving from the far side of the zone to on-street parking spaces within the zone. This is a good idea which was also supported in the 2003 Mayor's Parking Taskforce Report. The Nelson\Nygaard technical memorandum is right in calling to "limit the number of permits issued based on RPP-regulated curb parking capacity. In other words, the number of permits would be tied to the number of permit-regulated spaces in each RPP district." The first recommended option, though, wouldn't get there, because in many areas on-street parking is already heavily oversubscribed (meaning far more permits are issued than there are spaces) and grandfathering the rights to a cheap permit, and allowing a grandfathered permit-holder to actually sell his rights in the marketplace, means that the number of permits would not in a reasonably short period of time be brought down sufficiently. This remains the case even accounting for the recommendations to accelerate the rate of permit forfeiture. The alternative that was presented, limiting on-street parking privileges to residents of a development only to curb spaces that front the development, could work, but it would be more restrictive than necessary.

In designing a policy remedy, it is important to remember that the goal of including parking requirements in the zoning code is to ensure that new housing constructed with little or no parking does not lead to the issuance of an excessive number of RPPs. I suggest a policy where homebuilders are provided matter-of-right discretion to build fewer off-street parking spaces than otherwise required if residents at the development lose the privilege to individually apply to the District for RPPs. Instead, the District Department of Transportation (DDOT) would be asked to determine the average

number of RPPs issued per development in comparable new matter-of-right developments that do comply with existing off-street parking standards. In each RPP zone, RPP allowances for non-compliant buildings would be based on this DDOT determination and then pooled. Residents of participating building would be eligible to bid for or otherwise purchase one of the limited number of RPPs made available from the city in their zone of residence.

One very important recommendation of the 2003 Mayor's Parking Taskforce Report to which there was no dissent, and which should be incorporated into our recommendations, is the idea of decoupling parking from the construction requirements for and purchase and rental of affordable housing in all parts of the city. This would leave it solely to the discretion of developers of low-income housing and to their future occupants to determine how much parking is worth paying for. The alternative is making housing less affordable by forcing its price up by \$30,000 to \$50,000 or more per unit for each parking space demanded by regulations—an amount exceeding the entire housing budget of many District minimum wage workers—and guaranteeing more car ownership, driving, traffic, and air pollution than if such parking were not mandated. It is not right to require new residents, especially low-income ones, to pay this much for off-street parking so that existing residents can continue to enjoy virtually free on-street public parking.

Finally, I'm pleased about the group's openness to the idea of accepting the elimination of parking minimums in areas where DDOT certifies that it has developed and is implementing an on-street parking management system that matches the provision of RPPs with the number of RPP-available spaces.

Sincerely,
Allen Greenberg

David Alpert's Comments

From: alpert@gmail.com on behalf of David Alpert, Greater Greater Washington
[alpert@ggwash.org]

Sent: Tuesday, April 08, 2008 10:13 AM

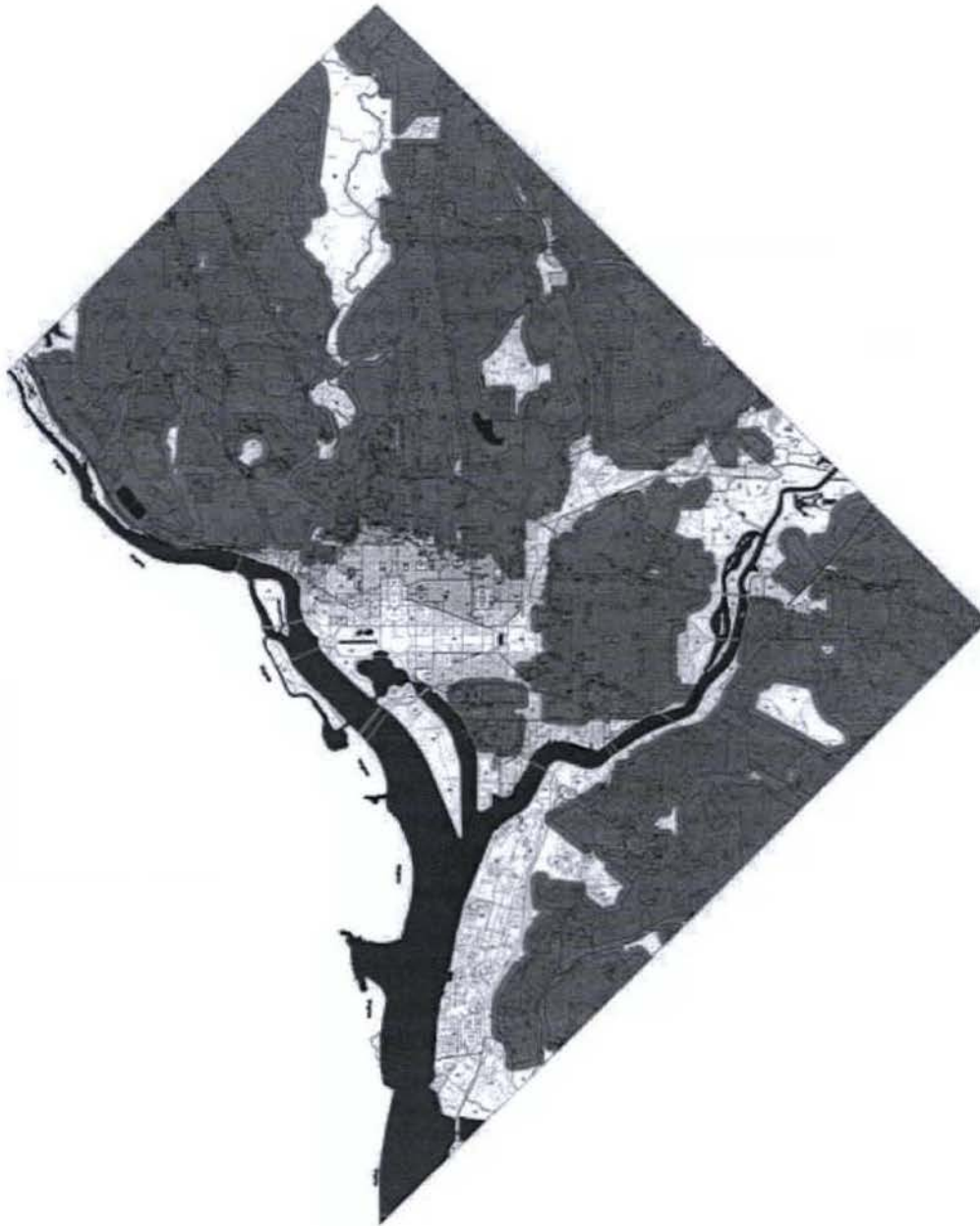
Subject: [Parking] Throwing the baby out with the 400-foot buffer

Dear workgroup members,

I continue to worry about this 400-foot zone buffer rule. I realize, and appreciate, the desire to shield low-density residential development from the spillover parking demand created by high-density development in neighborhoods like Friendship Heights. Personally, I feel that the best solution is performance parking, where residents (especially the new ones) don't necessarily get unlimited free parking for only \$15/year. But I am sympathetic to those who are less confident in this approach and am fine with keeping a buffer zone role,

However, this buffer zone is the exception that swallows the rule. 400 feet is a lot. I've made the below map from the zoning maps online. Everything in purple is within 400 feet of an R-5-B or below. As you can see, outside of downtown, virtually all land that's not in the middle of a Federal facility or park is considered a "buffer." Is this really a buffer or a blanket requirement?

Under the current draft which has no specific TOD language, any multi-family unit will require a parking minimum. That means if someone wants to convert their townhouse to two or three family, they are required to have a parking space. In my neighborhood there are many townhouses without alley access or backyards at all that are currently multi-family, or others who have not chosen to make their backyards into parking lots. I don't understand why these residential buildings should be illegal under the current rules such that they couldn't be rebuilt if they burned down, or such that new neighborhoods couldn't be built in the same mold. It's working fine here right now, letting some property owners choose to have parking and others choose not to if they can use Zipcar when they can't take transit.



I urge OP to make this buffer apply to only low-density zones, and/or put language in the draft that specifically ensures that TOD zones like Dupont and U Street will be exempt. Otherwise, we are in fact increasing the minimums in the small number of R-5-E and C-2-C and above zones, and sacrificing compliance with the Comprehensive Plan as well as the consensus at the second parking meeting.

More about the 400-foot buffer is here:

<http://greatergreaterwashington.org/post.cgi?id=756>

David

Karen, I've read David Alpert's very thoughtful comments and agree with them. Where TOD exists, developers should be encouraged to build less parking, not more.

Also, the parking policy can be used to encourage people to take public transit. Many people drive out of habit, as well as because parking is cheap, even if very difficult to find at certain times of the day in congested locations. The price of on-street parking should reflect the true cost of parking, not be so artificially low. I recall Mayor Williams say that most of the automobile traffic downtown was caused by people driving around looking for a cheap on-street parking place. He proposed raising the cost of this parking to be more realistic, but it was shot down by the Council. I strongly recommend that it be implemented.

John Henry Wheeler
Tenleytown (Ward 3)
Washington, DC
wheels-dc@att.net

Comments on Draft Vehicle Parking Chapter

From: Marilyn J. Simon

Date: April 15, 2008

The draft Vehicle Parking Chapter includes some radical recommendations to be implemented across the District. The underlying reports characterize these recommendations as “best practices,” and yet provide no examples where these recommendations have been implemented, much less evaluated, on the scale proposed. As noted below, the cities that have eliminated or reduced minimum parking requirements have done so only on a very limited basis. For example, Arlington, Virginia has retained a minimum parking requirement of at least one space per dwelling unit for all the zones near the Metro entrances, but has reduced the minimum parking requirements for a limited set of uses. As noted in another Nelson/Nygaard report, imposition of maximums in the absence of hard data is not described as a sensible approach, although they note that Portland and Cambridge based maximums on significant research.

The sections of the report which provide the justification for the major recommended policies, eliminating or drastically reducing minimum parking requirements and imposing maximum parking limits, are based on assumptions about the District that simply are counterfactual. The most obvious of these is the assumption that the District’s transportation system is sufficiently robust to efficiently satisfy most of the transportation needs of a high proportion of the many types of households, who might find it desirable to live near a Metro station, commercial district or transportation corridor.

The proposals in this draft chapter would set into motion a sweeping experiment, which could potentially have irreversible, adverse impacts on many neighborhoods across the District. I have described below some of the issues that have not been resolved, and have compared the proposed regulations with the zoning code for several other cities cited in the Nelson/Nygaard reports.

General Concerns

1. Goal of Zoning Update: The March 28 Nelson/Nygaard report describes the goal of the current project as “identifying zoning changes that would result in reduced accommodation of parking at new development in the District.” This goal is overly narrow, assumes the result and ignores the overarching need to evaluate parking needs and the impact of changing the current regulations on the District’s neighborhoods. Rather than assuming a result, the purpose of this project is to consider updates of the zoning regulations that are consistent with the new Comprehensive Plan.

2. The description of “best practices” lacks a basis: Nelson/Nygaard has defined certain policies as “best practices,” but has provided no examples of other jurisdictions that have adopted these policies on the scale that is recommended in their report and included in OP’s draft language. For those examples where a municipality has implemented some portion of their recommendations, the policies were implemented in very limited geographic areas. These are described in more detail, below. Many of these jurisdictions have minimum parking requirements that are higher than DC’s current standards, let alone the proposed reductions. In addition, Nelson/Nygaard did not provide studies or data that could be used to evaluate the impact of these policies, either on residents’ use of private vehicles and public transportation, or on spillover parking in the adjoining residential neighborhoods, if there even are any adjoining low and moderate density residential neighborhoods in those jurisdictions. Thus, it is impossible to determine whether the policies, even in those limited areas, had the desired effect. It is also

impossible to determine whether implementation of those policies, if they were actually implemented near areas comparable to the affected DC neighborhoods, had an adverse impact on neighborhoods in those cities.

An unsupported assertion that these practices are “best practices” does not justify the recommendation for such far reaching changes. Nelson/Nygaard and OP have provided no examples of jurisdictions that have implemented these recommendations on the scale recommended. There are no examples where any of these policies, even on a smaller scale, have been in place for a sufficiently long period of time to allow a careful evaluation of whether the policies achieved the intended goals or had any negative consequences.

3. There is no basis for the claimed benefits associated with eliminating or reducing minimum parking requirements or establishing maximums: The Nelson/Nygaard report includes many assertions about the benefits of eliminating minimum parking requirements and establishing maximums. However, the reports have not provided a solid analysis which supports those conclusions or any credible research that supports their claims. And there certainly was nothing presented to support the broad application of a policy that eliminates many minimum parking requirements and imposes maximums on the scale that they contemplate.

4. The theories on which the claimed benefits are based assume a transportation system that is far more robust than the transportation system available in DC.

5. Discussion of Resident Parking Permit Program does not address the issues faced by many District neighborhoods: The Nelson/Nygaard discussion of the resident parking permit program demonstrates that they have not examined the conditions in D.C. They do not understand the issues faced by many of the neighborhoods across the District or how the concerns vary from one neighborhood to the next. The proposal is inappropriate for most neighborhoods, would do little to solve to spillover issues, and will exacerbate some of the problems those neighborhoods face.

6. The regulations cited in the Nelson/Nygaard reports frequently actually have minimum parking requirements, even in areas served by mass transit, that far exceed DC’s current minimum parking requirements. As noted below, many of the jurisdictions cited in the Nelson/Nygaard report have parking minimums that are significantly higher than the District’s current parking minimums. To the extent that there might have been any reductions for projects near Metro, some of the reduced minimums are multiples of DC’s current parking minimums. For example, in Arlington, the minimum parking requirement for multi-dwelling unit projects within 1,000 feet of a Metro entrance, at least one space per dwelling unit, is three times the minimum that OP is proposing for MDUs that are within 400 feet of a low or moderate density neighborhood – six times the minimum if you take into account the 50% reduction that is available upon payment to DDOT.

7. The Zoning Regulations should not be used to require developers, building owners and condo owners to subsidize a private car-sharing company. It is inappropriate to use the zoning regulations to require developers, and later building owners and condominium owners, to subsidize a car-sharing company, i.e., Zipcar. The Nelson/Nygaard report includes a recommendation that would require newly constructed buildings to offer Zipcar, or another car-sharing company, parking spaces with 24-7 access at no cost.¹ At the Working Group meeting,

¹ The table in the Nelson/Nygaard Report calls for approximately twice the number of spaces that is required in San Francisco.

OP stated that this provision would be added to the draft Vehicle Parking Chapter. This involves a direct cost to the developer, and on-going costs to the building owner or condominium owners, as there is no revenue from these spaces to cover maintenance costs. It also means that either the car-sharing spaces must either be located outside the secure area, or the car-sharing members must be granted access to the secure areas of the building, either of which might be a hardship.

There has been no research to demonstrate any benefit from requiring developers and building owners to provide this subsidy. In fact, in some other cities, the car-sharing company operates by paying market rates for off-street parking or by negotiating below-market rates or a free space with some building owners who have determined that an on-premises car-sharing vehicle would be an attractive building amenity and/or useful for obtaining LEED credit.

While it has been claimed by some that parking minimums should be eliminated or reduced because they raise housing costs, certainly requiring the developer and the building owner or condo owners to provide a free parking spaces to a private company will also increase housing costs. This subsidy has not been justified. If the proponents of this change can provide such a justification, it should be pursued through other channels, not through adding language in a zoning update process.

Specific Issues and Examples

A. P 2.1: Elimination of minimum parking requirements for office uses, even within 400 feet of a low or moderate density neighborhood:

P 2.1: The table includes no minimum parking requirement for office space, even office space that is within 400 feet of a low or moderate density residential area. Even with a minimum parking requirement, many of these neighborhoods face significant parking spillover from nearby commercial district, and many clients visiting office space in the commercial area intend on staying less than two hours, so RPP restrictions do not apply and the neighborhood streets become a free parking lot for the offices in higher density zones.

B. P 2.1: Reducing or eliminating minimum parking requirements:

P 2.1: It would be irresponsible to eliminate or reduce the minimum parking requirements as proposed in this section. As noted below, Nelson/Nygaard has not provided any examples of jurisdictions that have eliminated or reduced parking requirements on the scale that is being recommended here. To the extent that examples are provided, these policies were only implemented in a few, carefully targeted parts of the city. To put this experiment into motion on a city-wide basis is irresponsible and might result in irreversible harm to many DC neighborhoods, some of which are already bear significant costs related to spillover parking from nearby commercial and higher density residential zones.

The table in P 2.1 has eliminated or reduced the minimum parking requirements for a large number of categories city-wide. The reports provided by Nelson/Nygaard have provided no examples where any municipality has made such a drastic change in the minimum parking requirements. In fact, the examples provided in the Nelson/Nygaard report only cite the elimination of minimum parking requirements in downtown districts, and then only for some uses. As noted below, Arlington, Virginia, with the same transportation system as DC, maintains minimum parking requirements for multi-family dwelling buildings, even near Metro stations,

that are significantly higher than DC's current parking minimums for multi-family dwelling buildings.

The Nelson/Nygaard "Best Practices Review," in Section II: "Zoning Reform Best Practices," cites Milwaukee, Seattle and Pasadena as examples of cities that have implemented "reducing/'tailoring' minimum requirements." [See Best Practices Review at pp. 5-6.] The examples of cities that have eliminated minimum requirements include Milwaukee, Seattle, Portland, and San Francisco." [See Best Practices Review at p. 7.] Arlington, Virginia is cited as an example of a jurisdiction that has reduced parking minimums near Metro Rail stations. [See Best Practices Review at p. 13.] The extent to which these jurisdictions have actually implemented these policies is described below.

- **Milwaukee:** In the first example, Nelson/Nygaard writes: "Milwaukee, WI has no minimum parking requirements for any downtown land use except high-density housing, where the ratio is only two spaces per three units." Note that, only for downtown land do they mention the elimination of minimum parking requirements, and there is a minimum for high-density housing downtown, a requirement is twice the requirement that OP is proposing for MDUs within 400 feet of a low or moderate density neighborhood, and actually is four times the minimum when the 50% reduction that OP is proposing is factored in.
- **Seattle:** In describing the implementation of this policy in Seattle, Nelson/Nygaard only asserts that Seattle allows reductions in minimum parking requirements based on several, very limited factors, has eliminated minimum parking requirements only in the downtown area, and has some reductions in the minimums in mixed-use, dense neighborhoods.
- **Pasadena:** For Pasadena, the third example in the Best Practices Review, Nelson/Nygaard cites reduced minimums, not an elimination of minimums. The reduction in minimum parking requirements is restricted to the central district and certain transit oriented developments.
- **Portland has minimums for most of the city that exceed those in DC's current regulations, much less the reduced minimums that OP is proposing for the areas and uses where parking minimums are retained:** Portland, Oregon, cited in the Nelson/Nygaard report as eliminating minimums for both commercial and residential uses in the central business district, has maintained minimums for most of the city, and those minimums exceed current DC regulations and are far higher than OP's proposed zoning minimums in section P 2.1. For example, for residential zones outside of the "central residential zone" and the "high density, residential zone," there is a minimum parking requirement of one space for each dwelling unit, except for SROs. In the "high density residential zone," which is limited to areas that are well-served by transit facilities, the minimum parking requirement for buildings with four or more units is one space for every two units. This is one and a half times the parking requirement that is being proposed for multi-family dwelling housing that is within 400 feet of a low- or moderate-density neighborhood, and three times the parking requirement for those areas if the 50% reduction is factored in. Table 266-2 of Chapter 33.266 of the Portland zoning code includes a list of the minimum parking requirements for a wide variety of uses.
- **San Francisco has parking minimums, in effect in a large portion of the city, which generally are higher than DC's current minimum parking requirements and cover a wide variety of uses:** In San Francisco, Nelson/Nygaard note only that they have removed minimum parking requirements for multi-family dwelling buildings and only in the downtown or central business district areas. In fact, Section 151 of the San Francisco zoning

regulations includes a “schedule of required off-street parking spaces. That table requires one space per dwelling, except in specific zones and certain uses. The exceptions to the one space per dwelling are quite limited, with a requirement of one space for every four dwelling units in RC-4 and RSD districts, no minimum in DTR and C-3 districts and a reduction (to one-fifth of the normal minimum requirement) for buildings specifically designed for senior citizens or physically handicapped persons. The regulations also define minimums for group housing and SROs, as well as a long list of other uses, including hotels, hospitals, schools, churches and institutions, and various commercial uses.

- Arlington, Virginia has minimum parking requirements, even near Metro, for most uses, and many of those minimum parking requirements exceed DC’s current standards: In Arlington, minimum parking requirements for most zones are listed in Section 33. This section includes the required parking as well as the limited reductions that are allowed when a major portion of the use is within 1,000 feet of a Metrorail Station entrance. I have listed below some of the minimum parking requirements and all the reductions that apply to uses near Metro. Also listed are some differences in these requirements for various zones that are near Metro. As you can see from this table, the minimum parking requirements in Arlington are all significantly higher than the current minimum parking requirements in DC and the reductions in those requirements for proximity to a Metro entrance are quite limited. For some zones near the Ballston and Virginia Square Metro station, the minimum parking requirement for apartments and mixed use buildings is at least one space per unit, and in some instances, additional visitor parking is required.

The general requirements of Section 33 for Arlington include:

One- and two-family dwelling, other than those fronting on a cul-de-sac	One (1) space per dwelling unit [DU]
One- and two-family dwelling fronting on a cul-de-sac	Two (2) spaces per DU
Town houses and stacked one-family dwellings	Two (2) spaces for each DU and one-fifth (1/5) additional parking spaces per DU for visitors
Dwellings other than one- and two-family	1 and one-eighth (1 1/8) spaces for each of the first 200 DU in any structure and one (1) space for each additional DU
Retail	One (1) space for each 250 SF of GFA on the first floor plus one (1) space for each 300 SF located elsewhere, followed by a list of exceptions for particular types of business, such as furniture and appliance stores
Office	For physicians, surgeons and dentists, there is a table based on the square footage of the building, with 1 space for each 150 SF for the first 5,000 SF, 1 space for each 200 SF for the next 10,000 SF, and 1 space for each 250 SF for the area in excess of 15,000 SF For other office buildings, the requirement is based on the square footage of each floor, ranging from one space per 250 SF for the first floor to one space per 400 SF for space located above the fifth floor.
Restaurants	One space for every 6 seats.
Other categories	The regulations list requirements for a total of 33 categories of uses, along with a provision that for uses not listed, spaces should be provided on the same bases as required for the most similar listed use.

The provision in Section 33 for parking in Metro Station areas, defined as areas where the major portion of the use is within 1,000 feet of the entrance, offers very limited reductions in these requirements. Section 33 also specifies that if the floor area is converted to another use, the required parking must be provided.

Restaurants operating only between 6:00 am and 6:00 pm	Exempt
Restaurants that operate between 6:00 pm and 6:00 am	Restaurants with 200 or fewer seats are exempt from the minimum parking requirements. Restaurants over 200 seats are exempt for the first 200 seats, but shall provide parking spaces in accordance with the regulations for the number of seats that exceeds 200 seats. This means that the restaurants near Metro with more than 200 seats have a reduced minimum parking requirement. The reduction is approximately 33 spaces. These restaurants can provide 33 fewer spaces than a restaurant of the same size which is not near Metro The required spaces can be provided off-site through a legally binding agreement, but must be located in a commercial or industrial district.
Retail and service-commercial uses	Exempt for the first 5,000 SF per main building, except for certain uses, i.e., a reduction of up to 20-33 spaces, depending on use.
Grocery stores, which are not the principal use on a site	Exempt for the first 15,000 SF, i.e., a reduction of approximately 60 spaces if the grocery is on the first floor, 50 spaces if located elsewhere.

Note that there is no reduction for residential uses even if they are located within 1,000 feet of a Metro entrance, and that the requirement for multi-dwelling unit residential development is higher than the current requirement in DC for all zoning categories.

- In Arlington, there are also some modifications of the requirements in Section 33 for particular zones, some of which are near Metro, but for each of these, we see that there are minimum requirements, and that they are significantly higher than the current DC requirements and significantly higher than the proposed DC requirements.
 - For the Rosslyn Commercial Office, Retail, Hotel and Multi-family Dwelling District, parking minimums are specified, although there is a provision for changes by Site Plan Approval. ACZO Section 25B(F) specifies a requirement of one parking space for each dwelling unit. For commercial uses, TDM plans are required and the minimum parking is one off-street space for every 1,000 GSF of office, retail or service gross floor area and a maximum of one off-street space for every 530 GSF. Short term convenient parking for customers is also required. Hotels have a minimum of 0.7 off-street spaces per guest room and dwelling unit, and no maximum.
 - For R-C, Apartment Dwelling and Commercial District, “designed for use in the vicinity of the Metro-rail stations and, to be eligible for the classification, a site or the major portion of a site, shall (1) be within a one-quarter (1/4) mile radius of a Metro-rail station entrance and (2) be located within an area designated ‘high-medium residential’ or other compatible designations on the general land use plan,” the Arlington regulations include the following requirement: “Parking spaces shall be provided as required in Section 33, provided, however, that as part of the site plan approval, the County Board may reduce this requirement to no less than one (1) space for each unit.” The apartment projects have a maximum FAR of 3.24.
 - For some portions of Virginia Square, the MU-VS district, development is subject to the parking requirements of Chapter 33, except that no parking is required for the first 5,000 SF of some uses, and restaurants that expand might provide the required additional parking off-site at a

close location with a legally binding parking agreement. For MU-VS in Virginia Square, there is a requirement of one off-street space per dwelling unit, 0.7 off-street spaces per guest room for hotels, and one off-street space per 580 SF of office space, with conditions for shared parking. The County Board may have a different requirement for a particular proposal.

- For C-O-A, Commercial, Office and Apartment Districts, classification “to encourage a coordinated mixed-use development of office, apartment and hotel use in the vicinity of metro-rail stations,” the requirement is one space per dwelling unit, one space per 530 SF of commercial or office space, except in projects with associated residential uses, where it is one space per 580 SF, one space per hotel unit, and all the other regulations of Chapter 33 apply.
- For RA-H3.2 Multiple-family Dwelling and Hotel Districts, a classification is to provide for multiple-family dwelling development at moderate densities and, under appropriate conditions, high-rise hotel and/or multiple-family dwelling redevelopment within “Metro Transit Corridors,” the minimum parking requirements are higher than those listed above, with one space per dwelling unit, one space per hotel guest room or dwelling unit, and one space for every 300 SF of commercial space, and includes all the other regulations of Chapter 33.

C. P.2.2: Imposition of Maximum Parking Limits

P.2.2: The Nelson/Nygaard “Best Practices Review,” in Section II: “Zoning Reform Best Practices,” cites Portland, Oregon, as well as San Francisco and Cambridge, as examples of cities that established maximum thresholds. [See Best Practices Review at p. 8.]

San Francisco: The maximum parking limits were put into effect in May 2006, and apply only in the DTR (downtown residential) and C-3 (downtown commercial) districts. [Section 151.1] As noted above, for most of the districts, minimum parking requirements are in effect, and for many zones, they are significantly higher than the DC minimum parking requirements.

Portland: Table 266-2 lists the minimum requirements and maximum limits. For the residential categories, there is no maximum requirement in any zone, except for EX (the central employment district), where the maximum parking limit is the same as the minimum parking limit described on page 4, above. The minimum parking requirement for residential uses in most of Portland, which is also the maximum parking limit for residential uses in the central employment area, is significantly higher than the DC’s minimum parking requirement and significantly higher than the proposed minimum parking requirement.

Cambridge, Mass.: Section 6.36 has a table of minimum parking requirements and maximum parking limits. Section 6.36.1 gives the requirements/limits for residential uses. There are no parking maximums for any of the residential uses in any of the zones. For most of the uses including multi-family dwellings, the minimum is one space per dwelling unit in any zone. The requirement is lower, one space for every two units for elderly oriented housing. There are also minimums, but no maximums for hotels and motels. Many of the institutional uses and industrial uses have a minimum, but no maximum.

As noted in a Nelson/Nygaard paper, published by the American Planning Association, Cambridge and Portland based their maximums on significant research. The same paper warns against the imposition of parking maximums in the absence of hard data.

D. P.2.1: Oversimplification of Parking Requirements:

P.2.1: Oversimplification of the parking requirements. Each of the parking minimums has been replaced with very crude measures for the minimum parking requirements. Examples of other

zoning codes with these simplified parking requirements were not provided, and, in fact, it appears as though most of the other zoning codes that have been cited in the Nelson/Nygaard report have parking minimums that are much more granular, based on the use. I think that it is necessary to maintain granularity in the table of the minimum parking requirements.

San Francisco: See, for example, the San Francisco Zoning Code, Table 151, with over 30 categories, some subdivided by district, and with the parking minimums based on natural measures, logically related to the parking demand likely to be associated with that use, such as classrooms, guest bedrooms in hotels, inns and hostels, or seats in theaters, churches or stadiums. In addition, there are refinements, such as having a higher parking minimum for medical offices than for other offices, but lower for studios. For each of these, the requirement kicks in only if the occupied floor area exceeds 5,000 SF. For medical or dental offices, they require one space for every 300 SF of occupied office space. For offices or studios for architects, engineers, etc., they require one space for each 1,000 SF of occupied office space, and for other business office, the requirement is one space for every 500 SF.

Portland: See, also, Portland, Chapter 33.266, Parking and Loading, Table 266-1, which provides the minimum required and maximum allowed parking spaces. The table has minimums for all residential zones except “central residential” and for most of the commercial zones, although there are no minimums for the central zones, in CN1, small commercial sites in or near dense residential neighborhoods, in CO1, small scale office, in CM and in CS. In the residential category, for “household living,” the minimum is one space per unit, except SROs which have one space for every 4 units and high density residential zones, which have a minimum of one space for every two units. While the minimums are somewhat less granular than the minimums on the San Francisco regulations, the minimums are based on logical units, which would have a natural relationship to demand for parking.

E, P.3.2: Flexibility to reduce parking requirements by 50% subject to payment to DDOT and DDOT review.

The proposal to allow a 50% reduction in the parking requirement, subject to DDOT review and a contribution to DDOT, allows for too much flexibility without sufficient review. This is critical since OP has not examined whether the proposed minimum parking requirements are sufficient to mitigate the harm to neighborhoods from parking spillover and the proposed parking requirements are significantly lower than many of the minimum parking requirements in similar jurisdictions with similar transit systems. The provision by which the reduction in the parking requirement is contingent on a contribution to DDOT, where DDOT is the only agency responsible for reviewing the request for the reduction, creates a perverse incentive. P3.2 does not offer District residents an opportunity to present their concerns to, for example, the BZA about a request for a reduction of up to 50% in the number of parking spaces required and does not provide residents with assurance that DDOT will be carefully evaluating the impact of the requested flexibility on the District’s neighborhoods.

FROM: LOUISE BRODNITZ
4/17/08

Apparently from the Nelson/Nygaard best practices review, there is no US municipality that has fully implemented "best practices" in regulating parking to minimize externalities such as traffic congestion, reduced air quality, and the economic impacts of poor access. Possibly, DC can move beyond what other US cities have been able to achieve in limiting parking to mitigate congestion and related costs.

Best Practices as I understand it (from, for example, Wikipedia) is a way of accomplishing a task that is more effective at delivering a particular outcome than any other technique, method, process, etc. Best practices for parking requirements have not yet evolved in practice in the US to the extent they are in place in London and many European cities. The N/N examples from US jurisdictions such as Arlington, Portland, etc., are not true exemplars, but rather some of the best so far in the US today.

Places where "best practices" have been more effectively implemented seem to have quite effective transit already in place (in most cases because they retained their streetcars, or have built robust networks of transit). In addition, they seem to have policies (eg, gasoline taxes, strict parking management, etc.) that work together to support best practices for parking mandates.

The fact that DC does not have the transit, parking management and other policies in place will surely limit public enthusiasm for implementing "best practices" here. For example:

DC does not currently provide the level of transit service needed to support these best practices. Some of the resistance to the N/N recommendations may stem from the fact that transit is not yet an effective alternative yet for many residents and so they need parking availability.

DC encourages developers who seek to increase density, but does little to mitigate the jarring impact of these larger developments on neighborhoods. Some of the resistance to the N/N recommendations may stem from a desire to hold back excessive density or at least to require developers pay for the externalities density creates, such as increased parking demand.

DC does not currently provide the kind of on-street parking management that effectively prevent spillover. Additional resistance to the N/N recommendations likely stem from anticipation of spillover parking effects from implementing the best practices.

Implementing best practices without truly effective transit, density charges and parking management programs in DC will be a hard sell to many. It is not clear how quickly these pre-requisites can be met. However, in order to plan for DC's more congested, more dense future, DC urgently needs to implement "best practices", e.g. dramatically curtailing parking minimums, even if DC would be way ahead of other US cities in doing so, and even if the infrastructure and policies to support these dramatic parking limits is not yet in place.

Louise Brodnitz

Parking Comments from John Goodman

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As to P.1.4, don't you need the language that's now in § 2100.10(b), to allow a property owner to reduce the amount of parking down to the level now required? For example, when a building was built there was no parking required, it now has 20 spaces and the regs now require 10; shouldn't the owner be able — in fact, encouraged — to reduce the amount of parking down to 10 without making her go to the BZA?

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You propose a 1-space-per-3-unit requirement for all multi-unit residential buildings within 400 feet of low or moderate density residential zone. I don't know about all the city, but in the area I am most familiar with, this would impose parking requirements in many areas where they are most unnecessary. For example, there are many apartment houses within a block or two of Metro stations that are also within 400 feet of an R-3 zone. This is exactly where we don't want to require (or even encourage) parking.

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P.6.1 raises the issue that was (much) discussed in the Height context of what is a "building." A definition like the one proposed in that context ("a structure on a single record lot having shared mechanical systems and floorplates" etc.) should apply here.

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	Hotel or Inn	1 for each 10 hotel units	2 for each 50 hotel units
	Parking	None	1 for each 20-10 auto spaces, min 10
	Outdoor Recreation	None	1 for each 20-5 auto spaces, min 10
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	Warehouse and Freight	1 for each 40,000 SF of GFA, min 2-5	None
	Non-Accessory Parking*	None	1 for each 20 auto Spaces, min 10
Institutional	Transit Centers	None	8
	Park and Ride	None	1 for each 20-10 auto spaces, min 10
	School - K-5	4 for each grade-served 10% of students 3% of employees	1 for each grade served
	School 6-12	10% of students 3% of employees 1 for each grade-served	1 for each classroom
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Comment [MSOffice2]: Commercial developments or major rehabs more than 3,000 SF should be asked to provide minimal bike parking.

Comment [MSOffice4]: For retail/dining services, 1 outdoor rack per 3,000 SF is much more appropriate. Not all commercial developments will be massive like Target. Thus, making sure even the "smaller" scale commercial developments provide minimal bike parking is critical.

Comment [MSOffice5]: This should be 10% of car parking to match the Council's bill.

Comment [MSOffice6]: Outdoor rec implies parks, where more bikes should be accommodated. 20% of available car spaces is a good place to start.

Comment [MSOffice7]: Delete this category. Bike spaces per new transit center will vary widely. 8 is way too low for any DC station.

Denise Johnson's Parking Comments

P.1.6 – needs a little more editing. There is a phrase, “the use that existed immediately prior to the vacancy”, that is out of place.

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One last general comment: is this an opportunity to address the church parking issues where parishioners double park on Sundays? There are many neighborhoods that need help working this out. We did not specifically talk about churches and their requirements. I don't think this is a situation where we can expect people to take public transportation, and many of the vehicles come from outside of the city.

Comments from Bill Bonstra:

Parking issues:

- 1. Allow parking by right in "vault" space subject to DOT/DPW/Public Space approval.**
- 2. Screening requirement for on grade parking.**
- 3. New concepts: mechanical parking and individual parking lifts.**
- 4. Better definition of what constitutes a "driveway" and maximum grade of driveways vs. ramps.**
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Cheryl Cort's Comments

I'll send some more detailed comments later but wanted to respond to the concern about our group's discussion regarding the management of public curbspace as part of our consideration for reforming the zoning code's off-street parking requirements. We did discuss it in general terms, but not programmatically, because that needs to be led by DDOT. The link between on and off street parking supply is clear, the need to recognize the public interest in getting parking management right so that our city is vibrant, walkable, and offer more affordable housing and commercial space.

I agree that the point of conflict is about the public's expectation of how valuable public curbspace is used, not how much off-street parking is built. I don't think that the government should be telling private housing and commercial buildings how much car storage they should have. The government should be managing public curbspace where residents and visitors have expectations about how the public curbspace is allocated. The case of instituting parking maximums is a public interest issue as the government seeks to reduce unnecessary traffic generated by subsidized parking and fully utilize public investments in transit and other public infrastructure (sidewalks, bicycle facilities). Too much parking undermines these public investments and fails to connect the user with the true cost of building and maintaining parking (parking charges rarely recover the cost – which means everyone subsidizes the driver). If the user of parking paid more of the actual cost of parking, less parking would be demanded. When parking is free – or 4 cents a day, as is the case for RPP – many higher density neighborhoods have strong demand for parking.

Reform of RPP – or changing it to do much more than keeping daytime commuters away – has long been discussed. This was an active topic in the Mayor's Parking Task Force a few years ago which included Nancy's & others suggestion of RPP boundaries smaller than Ward boundaries. The newly instituted parking management efforts for the new stadium and Columbia Heights are new tools addressing on-street management that encompasses RPP rules. This effort is better adapting curbspace management to address the key conflicts related to residents' expectations about parking in their neighborhoods. Also, a few years ago DDOT proposed raising the RPP fee from \$15 per year to \$25, and a second permit to \$50, and capping at 3 with \$100. This bill went nowhere. The belief among some RPP holders that it should be cheaper to store a private vehicle on the street for a year than to ride the bus for 2 weeks is strong. More recently, DDOT has been actively working with Councilmember Wells and Graham to develop parking management approaches to better manage spillover parking demand. While RPP is the last step in this effort, some change to RPP are being made.

Thus, RPP and curbside management in general must be adapted to better address residents' and businesses' concerns and needs.

Government requirements for off-street vehicle storage in more urban neighborhoods has very negative consequences. Parking costs \$25,000 – 50,000 – which can be bundled into housing costs, making housing in highly transit-accessible neighborhoods more expensive. Sometimes housing units are deleted from projects in order to accommodate more parking. In other words, homes for cars are more important than homes for people – this has happened in my neighborhood, a block from the U Street Metro. Often neighbors not wanting competition for their 4 cents a day parking, insist on new building provide more parking than the builder thinks there's a market demand for. Clearly, the answer is managing on-street parking more equitably, not adding \$40,000 costs to housing, which increases car ownership, driving, less patronizing of local stores and transit. While lower density neighborhoods do not have the parking demand for (free) parking that higher density neighborhoods do compared to amount of curbspace available, some residents may not be aware that managing on-street parking does work – people make choices about how to spend their money – parking, a first or second car? Or a 2 bedroom condo? People in Adams Morgan and U Street don't live there because parking is cheap and abundant; they live there because it's easy to walk, bicycle ride, transit to all sorts of destinations. If a

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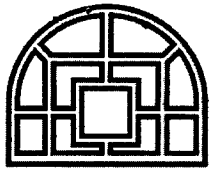
Comment [MSOffice2]: Commercial developments or major rehabs more than 3,000 SF should be asked to provide minimal bike parking.

Comment [MSOffice4]: For retail/dining services, 1 outdoor rack per 3,000 SF is much more appropriate. Not all commercial developments will be massive like Target. Thus, making sure even the "smaller" scale commercial developments provide minimal bike parking is critical.

Comment [MSOffice5]: This should be 10% of car parking to match the Council's bill.

Comment [MSOffice6]: Outdoor rec implies parks, where more bikes should be accommodated. 20% of available car spaces is a good place to start.

Comment [MSOffice7]: Delete this category. Bike spaces per new transit center will vary widely. 8 is way too low for any DC station.



COALITION FOR SMARTER GROWTH

TO: Zoning Update Team, D.C. Office of Planning
FROM: Patrick Lynch, Coalition for Smarter Growth
SUBJECT: DC Office of Planning's Parking Zoning Proposal and Response to Committee of 100 Comments
DATE: July 10, 2008

This memo responds to comments from the Committee of 100, written by Marilyn Simon, which criticized Nelson\Nygaard's proposal to eliminate minimum parking requirements in parts of the District of Columbia. It includes a review of the latest research on these requirements and specific rebuttals to the Committee's main arguments.

A number of authors have written about the problems posed by minimum parking requirements. Foremost among them is Donald Shoup, a professor of urban planning at UCLA. His research has shown that most parking standards have little scientific basis. Many cities simply copy what other jurisdictions have implemented, while others derive from a flawed and outdated book of standards published by the Institute of Transportation Engineers. Its estimates for parking need are based on limited surveys of suburban places, where other forms of transportation that do not require parking, such as walking, cycling, and transit, are not an option.¹ Furthermore, the estimates assume that parking is provided free.² As a result, minimum parking requirements, especially in cities where alternative transportation is available, tend to be vastly exaggerated.

The provision of this unnecessary parking has a number of negative consequences. Todd Litman of the Victoria Transportation Policy Institute has argued that, on average, minimum parking requirements raise the cost of housing by 10-20%.³ The problem is most pronounced in cities with high land values, such as Washington. Developers must either give up a portion of their site to a surface parking lot, or build structured parking, which can range in cost from \$15,000 - \$50,000 or higher per space. Faced with these costs, developers often choose to build fewer housing units and raise prices. Litman cites a number of studies demonstrating that off-street parking requirements reduce the supply of affordable housing.⁴ This is not the only consequence of these costs. Richard Wilson argues that minimum parking requirements encourage development in suburban locations, where land is cheaper and surface parking is more viable. In other words, D.C.'s parking requirements put it at a disadvantage in terms of attracting development and promote sprawl.⁵ Parking requirements also generate more traffic. A 2005 study in San Francisco found that each residential parking space is responsible for several trips per week and residents of

¹ Donald Shoup. "The trouble with minimum parking requirements." *Transportation Research A* 33: 1999.

² Donald Shoup. "The trouble with minimum parking requirements." *Transportation Research A* 33: 1999.

³ Todd Litman. "Parking Requirement Impacts on Housing Affordability" Victoria Transport Policy Institute. March 31, 2008. <http://www.vtpi.org/park-hou.pdf>

⁴ Todd Litman. "Parking Requirement Impacts on Housing Affordability" Victoria Transport Policy Institute. March 31, 2008. <http://www.vtpi.org/park-hou.pdf> see also: Ryan Russo. "Parking & Housing: Best Practices for Increasing Housing Affordability and Achieving Smart Growth" Non-Profit Housing Association of Northern California. May 2001.

⁵ Richard Wilson "Suburban Parking Requirements: A Tacit Policy for Automobile Use and Sprawl." *Journal of the American Planning Association* 61: Winter 1995.

buildings with reduced parking were less likely to drive.⁶ Litman concludes that:

Minimum parking requirements are regressive because they force residents to pay for parking facilities, even if they do not own a vehicle. They increase vehicle ownership, and therefore problems such as traffic congestion, accidents and pollution emissions. Generous parking requirements discourage infill development and increase sprawl, increasing impervious surface coverage and per capita vehicle travel.⁷

For these reasons, Shoup describes the use of minimum parking requirements as an “institutionalized folly.”⁸

Finally, it is important to remember that the elimination of minimum parking requirements does not equate to the elimination of parking. Developers will still have every incentive to build the amount of parking that supports the marketability of their projects.

With respect to the Committee of 100’s individual claims, which are underlined, the responses are below:

“1. The goal of the zoning update is not to reduce parking but to implement the comprehensive plan”

Since the comprehensive plan’s goals include promoting transportation demand management, improving efficiency, reducing air pollution, ensuring housing affordability, and conserving energy, the elimination of most minimum parking requirements and the problems they cause, is consistent.

“2. The description of “best practices” lacks a basis,” and “3. There is no basis for the claimed benefits associated with eliminating minimum parking requirements or establishing maximums.”

Nelson\Nygaard provided several examples of cities in the US that have either reduced or eliminated minimum parking requirements and/or established maximums. The Committee of 100’s memo is correct that some of these efforts have only applied to limited geographic areas, such as downtowns, but it ignores the fact that an entire country, the United Kingdom, has eliminated minimum parking requirements and suggested maximums. In addition, the changes proposed will not be radical, as the Committee of 100 suggests. For most of the city, non-residential uses will still be subject to minimum parking requirements (see attached map). Moreover, the negative consequences of minimum parking requirements, described above, are well-established in the research literature. Multiple articles in peer-reviewed journals have criticized minimum requirements in recent years and Shoup notes that no modern author has attempted to defend their use.⁹ Therefore, there is a strong evidential basis for reducing or eliminating parking requirements and using alternative methods to address spillover parking. Finally, if the District always waited to enact policy until other cities had implemented the same policy, it could never lead or innovate.

⁶ Rocco Pendola, Stephanie Ruddy, Elmer Tosta (2005) “What’s Parking Got to Do with It?” Spring 2005, Senior Seminar, San Francisco State University Urban Studies Department. (cited at <http://www.livablecity.org/campaigns/c3.html>)

⁷ Todd Litman. “Parking Requirement Impacts on Housing Affordability” Victoria Transport Policy Institute. March 31, 2008. <http://www.vtpi.org/park-hou.pdf>

⁸ Donald Shoup. “The trouble with minimum parking requirements.” *Transportation Research A* 33: 1999

⁹ Donald Shoup. “The Practice of Parking Requirements.” *Zoning Practice*. February 2006.

“4. The theories on which the claimed benefits are based assume a transportation system that is far more robust than the transportation system available in D.C.”

This assertion is contradicted by a substantial amount of evidence. First, the damaging effects of minimum parking requirements on density, walkability, and housing costs occur independent of any public transportation. Second, even in cities where public transportation is less extensive than in D.C., policies to increase the price of parking or reduce its supply have led to other methods of reducing trips by single occupancy vehicles, such as carpooling. Third, Washington D.C.’s public transportation system is robust. Metro is widely regarded as one of the best commuter rail systems in the country and even those who do not live near a Metro station are almost certain to have at least one bus stop within a ¼ mile.

“5. Discussion of Resident Parking Program does not address the issues faced by many District neighborhoods.”

Other than spillover parking, the Committee of 100 memo does not identify any unaddressed issues. It also does not provide any evidence to substantiate the assertion that Nelson\Nygaard’s proposal would exacerbate problems affecting the neighborhoods. With respect to spillover parking, the residential parking permit program can be revised to address this issue.

“6. The regulations cited in the Nelson\Nygaard reports frequently actually have minimum parking requirements even in areas served by mass transit, that far exceed D.C.’s current minimum parking requirements.”

As discussed above, minimum parking requirements are often based on weak evidence and tend to drastically overestimate the amount of parking necessary. Without knowing the evidence, if any, behind the creation of these standards for each city, one cannot assume that they are necessary or reasonable. Moreover, because D.C. has a relatively high population density, good public transportation, and a very low car ownership rate relative to the rest of the country, it *should* have lower parking requirements than other cities. Thirty-seven percent of D.C. households do not own a vehicle and in some high density census tracts, up to 70% of households do not own a car.¹⁰ In addition, according to the latest estimates of the American Community Survey (2006), 39% of the D.C.’s workers take public transportation to work. This is the third highest rate in the country after New York City and Jersey City.

“7. The zoning regulations should not be used to require developers, building owners and condo owners to subsidize a private car sharing company.”

Car-sharing organizations reduce car ownership and vehicle miles traveled. A substantial amount of research supports this, including a recent report from nearby Arlington.¹¹ The US Green Building Council also recognizes the benefits of car-sharing; developers can earn a credit towards LEED certification on their projects by providing spaces to car-share organizations. Requiring developers to make such spaces available is therefore a reasonable regulation to reduce traffic, air pollution, and the demand for parking, including spillover parking, in D.C. Furthermore, this regulation imposes only a tiny burden on developers. It only applies to those who build a large number of spaces and requires that a minimal number be devoted to car-sharing. For example, a garage with 300 spaces would only have to include 4 car-sharing spaces. In comparison to the subsidy provided to the automobile industry over the last 50 years through minimum parking requirements, this provision is minor.

¹⁰ 2000 U.S. Census

¹¹ http://www.commuterpage.com/pdfdocs/ArlCo_CarshareReport_2006.pdf; see also: Todd Litman. “Evaluating Carsharing Benefits.” Victoria Transport Policy Institute. 7 December 1999. Victoria Transport Policy Institute. <http://www.islandnet.com/~litman/carshare.pdf>

“A. P 2.1: Elimination of Minimum Parking Requirements for office uses, even within 400 feet of a low or moderate density neighborhood” [is inadvisable]

This should not be a major concern. Few areas of low-moderate residential density are within 400 feet of zones that allow for office development¹², other than C-2 zones, which will continue to have minimum parking requirements under the Office of Planning’s proposal. More importantly, residential parking permit programs and curb-space management are the most effective means of dealing with spillover parking, not minimum parking requirements. Improvements to these programs will yield better results while avoiding the negative side effects of parking requirements.

“B. Reducing or eliminating minimum parking requirements” [is problematic]

Please see response under 2 / 3 above.

“C. Imposition of Maximum Parking Limits” [is untested]

The provision of too much parking can have serious consequences for neighborhoods and business districts. Parking lots and structures promote automobile dependence, increase traffic, reduce walkability, increase the cost of goods, and decrease the accessibility of services. These problems are more detrimental to the quality of life in the city than spillover parking is. From that standpoint, it is more logical to set a maximum limit than a minimum. Several cities cited in the Nelson/Nygaard report have implemented maximum limits for certain districts and in Asheville, NC maximum limits apply city-wide.

“D. Oversimplification of Parking Requirements”

The “granular” nature of the parking requirements, lauded by the Committee of 100 memo, has received heavy criticism. As described above, they are often based on a limited number of surveys in suburban locations, if anything. Moreover, Donald Shoup has demonstrated that for some uses, the relationships suggested by these requirements between floor area and parking demand, for example, are statistically unsupportable.¹³ Rather than attempt to create enormous tables with a parking requirement for each possible building use, size, and location, the better solution is to let developers decide, up to a certain maximum, the amount of parking appropriate for their project. On-street parking management programs can address conflicts of public concern.

E. Flexibility to reduce parking requirements by 50% subject to payment to DDOT and DDOT review.

Under the existing system of variances, developers are not required to provide compensation if they provide less parking than required. This proposal improves the existing system because the fee that DDOT collects in exchange for the flexibility will increase DDOT’s ability to react to any issues associated with the development. There is little danger of developers abusing this privilege since, as mentioned above, they understand that an adequate parking supply is critical to their success and the fee they must pay to take advantage of the flexibility is substantial. According to the draft regulations, the fee will be equal to about 80% of the cost a parking space for each space under or over the limit. For example, under the assumption a parking space costs \$40,000 and a developer wanted to build 10 spaces less than the required minimum, the fee would amount to \$320,000.

¹² Based on the author’s calculations using GIS, about 11% of the land area zoned as low-moderate density residential in DC (R-1 to R-5B), is within 400 feet of a zone that would allow office development without minimum parking requirements under the proposed regulations.

¹³ Donald Shoup. “The trouble with minimum parking requirements.” *Transportation Research A* 33: 1999.

Subject: Re: Parking and Loading Language

David Alpert's comments on the Parking draft:

Maximums, Minimums, and TOD

- The minimums seem generally well restricted to those uses that have clearer needs for a minimum such as low density residential and to only larger stores in commercial corridors.
- Why are the maximums not yet recommended? It seems that we may want to discuss the appropriate levels.
- I think that the buffer zone rule, about multi-unit residential near moderate density residential, should only apply to lower density areas such as R2 and below. As an example, the building I live in is in a C-2A district next to R-5B. It is a multi-unit residential building without parking. It is also a ten minute walk from two Metro stations, has a bus line right outside and about ten others within a few blocks, and I believe the majority of residents use transit to get to work.

But under this draft, since it is within 400 feet of an R-5B district, one space per 3 units would be required, or 5 spaces in the case of this building. From the consensus I heard in the group, I think that this minimum parking should not apply to buildings such as mine because it is not in a "buffer" area just because it is next to R-5B rowhouses. Likewise, the U Street area is next to an R-4.

These are not the types of areas considered in the buffer zone discussion, and in fact the consensus to allow the buffer rule was accompanied by discussion about its acceptability specifically in the low density residential areas.

- **Friendship Heights, the origin of the buffer zone consideration, is mostly R-2 and below. Therefore, I would suggest that the buffer zone rule be limited to only R-1 and R-2 rather than everything up to R-5B.**
- **I also don't see the consensus of the group on transit-oriented districts in this draft. The N\N memo mentions a desire for more aggressive treatment but mostly focuses on residential parking management. I believe that the consensus of the group was that in transit-oriented areas, however they may be defined in the future, there should be no minimums of any kind and fairly comprehensive maximums.**

One person, I think Mr. Williams, set the tone of the group on the transit-oriented discussion. My notes of what he said: "Inherent in TOD is that you're going to put a max on parking. We're not saying what that is, but we agree that it's the very nature of it. TOD is to encourage use of transit. The way to encourage use of transit is not to have an open-ended supply of parking. One would **expect** less. Whatever makes it a TOD, it's there. I'm not prepared to say every Metro station is a TOD, but however it is defined."

- The subsequent discussion then revolved around whether other Metro stations should be considered transit-oriented. For example, the underutilized Benning Road station perhaps ought to have the aggressive parking treatment of a TO district in order to encourage more TO development and make it no longer underutilized. Regardless, it seemed that the consensus of the group was that, at the very least, in those areas that are considered TOD there should be no minimums and some maximums.

An area such as Dupont Circle or U Street would certainly qualify under any reasonable definition of a transit-oriented district, but as far as I can see there is no provision in the draft that would remove all minimums and create maximums when it is so designated.

- The section requiring parking to be located in the rear of the building or, on a corner lot, on the side yard facing the smaller street, looks excellent.
- Though not completely defined, the parking lot landscaping also looks good overall.
- I will follow up with bicycle parking comments if I have any after I review that section.

Sent 6/18/08

A reader just pointed out one item you might want to clarify in the bike parking rules: who must be able to access the showers required by BP.6.1.

For example, if the showers are inside a health club in the building that one has to pay to access, would that meet the requirements? I'm guessing we don't want that to be allowed. Would it be ok if the showers were inside a secured area that all employees could access with a badge, but not members of the general public? I think perhaps that is ok. Perhaps we should make this clear.

Similarly, the lockers required by BP.6.2 must be accessible 24 hours a day, but it doesn't say by whom. Employees by keycard access? Anyone?

Should I send comments like this to you via email or on the Web page?

David