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Washington, DC 20015

31 July 2008

Zoning Commission
441 4th Street N.W., Suite 210-South
Washington, D.C. 20001

Via fax: 202-727-6072

RE Zoning Commission Case 08-06-2, Comprehensive Zoning Regulations Rewrite

Dear Commissioners –

I'm writing to oppose the Office of Planning's proposals to eliminate minimum parking requirements, to impose parking maximums on new residential and commercial development, to allow developers to buy their way out of whatever regulatory regime is finally established, and to require that free/dedicated parking spaces for companies like Zipcar be provided in new construction. I'll be unable to testify in person this evening, but I hope you will accept my testimony in written form.

I'm a non-driver (and thus, a non-parker). I lead the lifestyle that these parking policies are ostensibly designed to encourage. We're a non-car-owning family living close to a Metrorail station and relying primarily on public transit (and our own feet) to meet our daily transportation needs. Yet the policies being proposed threaten to make my neighborhood less livable – even for carless folks like us.

My home is in Friendship Heights, in an area where residents, commuters, shoppers, restaurant and movie-goers, churchgoers, and people using our playground and baseball diamond all compete for on street parking, day and evening, weekdays and weekends. Many of the older homes the vicinity were built without garages. Demand for parking is high enough that access is already regulated through residential parking permits and, over the course of the 11 years I've lived here, such regulation has increased (longer hours, more stringent enforcement). It's now at the point where service people refuse to accept jobs in my neighborhood because they're afraid they'll either be unable to park or will get a ticket if they do succeed in finding a spot and can't finish the job in two hours. And I can't have more than one family over for dinner or a playdate on a weeknight, because anyone who arrives by car before 6:30 is likely to be ticketed and my parking pad will only accommodate one car. Meanwhile, I see neighbors paving over parts of their backyards and having workers park illegally in the alley to avoid dealing with the parking situation on the street.

In a context like this, it is imperative that new construction (and we've seen a lot of it here lately!) be required to provide enough parking to satisfy the new demand it will generate.

Parking is typically unbundled from the price of renting an apartment or buying a new condo in DC and our minimum parking requirements for multi-family residential buildings are set quite low. As a result,

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the amount of residential parking currently being produced is generally a function of the market rather than regulation.¹

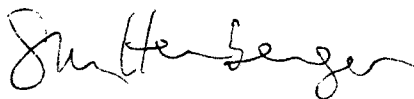
What's being proposed here is that DC regulate parking in ways that will force its underproduction. While the ostensible goal is to limit the market for cars -- the likely effect will be to limit the market for homes, offices, and retail in DC. People want to be able to park where they live and even people who are carless want parking to be available for houseguests, friends, repairmen, and domestic employees. Store-owners want to be in a location that has convenient parking for customers, many of whom drive when they shop because want a secure place to store their purchases and/or an easy way to haul them home. Employers often have employees who live throughout the area, including many who don't live in Metrorail-accessible neighborhoods. So if living/shopping/working in DC means a daily hassle because developers are prohibited from building enough accessory parking for homes/stores/office buildings, then more people will choose not to live/shop/work in DC. It's not as if there aren't viable alternatives nearby.

People don't decide whether to own a car based on whether they own a parking space; they decide whether to buy a house or rent an apartment based, in part, on whether they'll have a place to park. While there are some studies showing that parking pricing/restriction at public transit accessible workplaces can decrease how many people drive to work, there's no evidence showing that restricting the supply of residential parking will cause people to forego car ownership. If that's a theory that OP wants to test, don't let them use the entire city as their laboratory.

In sum, it makes no sense to increase the demand for already scarce on street parking by artificially restricting the production of off street parking. All the evidence that underground parking is expensive should be sufficient assurance that developers won't wantonly overproduce it. So forget imposing maximums. And in places or situations where there's empirical evidence that minimums are preventing good projects or leading to the overproduction of parking spaces, then change the relevant minimums. But don't trash the whole system. That's just irresponsible.

Finally, I think it would be outrageous if the law were to mandate the subsidization of hourly car rental companies by requiring the provision of parking spaces for their fleet in new construction. How sympathetic would you be if Avis asked you to require developers to house its fleet of rental cars? Not very, I expect. Zipcar's no better -- worse, actually, since it's monopolistic and overpriced compared to daily rentals. As the level of subsidization for Zipcar increases, we see lower-cost competitors like Enterprise leaving the city and I won't be surprised to see Avis driven out of upper NW as well. At which point my family will finally break down and buy a car!

Sincerely yours,



Sue Hemberger

¹ PUDs may be the exception -- there parking is negotiated and it could be the case that such negotiations lead to the construction of more parking than the market would warrant. But that's an empirical question. Are there substantial numbers of unsold/unrented parking spaces in buildings whose PUDs established the number of spaces?