

# COALITION FOR SMARTER GROWTH

RECEIVED  
D.C. OFFICE OF ZONING

2008 SEP -3 AM 11:00

August 29, 2008

Mr. Anthony Hood, Chairman  
D.C. Zoning Commission  
441 4th Street, N.W., Suite 220-South  
Washington, D.C. 20001

RE: Case No. 08-06-2 (Comprehensive Zoning Regulations Rewrite: Parking): Supplemental comments and response to Federation of Citizens Associations comments

Dear Chairman Hood and Commissioners:

On July 31, 2008, the Zoning Commission held a public hearing on the Office of Planning's (DCOP) proposal to reform parking regulations. The large majority of public witnesses, as well as the Coalition for Smarter Growth, expressed support for the proposal. Some, however, opposed it and this memo responds to their concerns. Opponents, such as the Federation of Citizens Associations (FCA), provide little evidence to support their arguments and many of their claims reflect an oversimplified characterization of the proposal. We ask that the Zoning Commission decide this matter informed by D.C.'s household and neighborhood characteristics, research evidence, and an informed assessment of the future needs of our city and its residents. Please accept these supplemental comments to the comments we submitted on July 31, 2008 and our July 10, 2008 memorandum to DCOP.

## Why we care

Years of research by parking policy experts and urban planners has proven that minimum parking requirements:

- increase the cost of housing for everyone,
- increase the cost of goods and services for everyone,
- reduce walkability and make it illegal to reproduce historic neighborhoods,
- often exaggerate the actual demand for parking,
- encourage automobile use, undermine transit use and generate traffic.

The last point is especially important. Some people may need cars for special reasons or certain trips. However, we must understand that in spite of the convenience of driving, the automobile as a form of urban transportation, has the most negative effects on the public. Relative to mass transit, bicycling, and walking, on a per traveler basis, single occupancy vehicles pollute more, emit more greenhouse gases, consume more space, create more congestion, cause the most roadway crashes, and are the most vulnerable to rising gas prices. Mandated private vehicle storage space in private developments (zoning parking minimums) has many negative effects that need to be reexamined in the context of D.C.'s

ZONING COMMISSION  
District of Columbia

CASE NO. 08-06-2  
EXHIBIT NO. 78 (orig)

continued revitalization and population and job growth. Given the reasons cited above, transportation for a revitalized city cannot rely on increased use of private vehicles. A better approach that builds on the strengths of the city is needed -- DCOP's proposal does this.

## The Policies of Other Cities

That other cities in America have not implemented the same policy at the same scale as proposed by DCOP does not mean we cannot craft an innovative policy that fits our city and our times. As we argued in our memo dated July 10, 2008, the District of Columbia is unique among American cities because of its high percentage of carless households and high rate of public transportation usage (see Table 1 and attached graphic "Life Without a Car? Possible and Popular in D.C."). Arlington, an example often cited by the opposition, is not an

appropriate comparison because its residents are far more likely to own a car and much less likely to use mass transit. Further, cities such as Portland, San Francisco, and Milwaukee have reduced or eliminated minimum parking requirements downtown, even though their residents are more likely to own a car and drive more than D.C. residents. In the case of San Francisco, the city converted parking minimums to maximums for downtown neighborhoods in 2006 and has continued to expand this policy to other neighborhoods. By the end of this year, the city expects that the policy that eliminates most minimums and imposes maximums will cover approximately one-third of the city and apply to virtually all new development in the city for the foreseeable future.<sup>1</sup> Given these facts, the District can be confident that implementing parking reforms on a wider scale is supported by D.C.'s unique circumstances and informed by the experience of others. Finally, the opposition's characterization of DCOP's proposal as a city-wide elimination of minimum parking is oversimplified. As our July 10, 2008 memo to DCOP showed, minimums will still apply to non-residential properties in most of the city under the proposal.

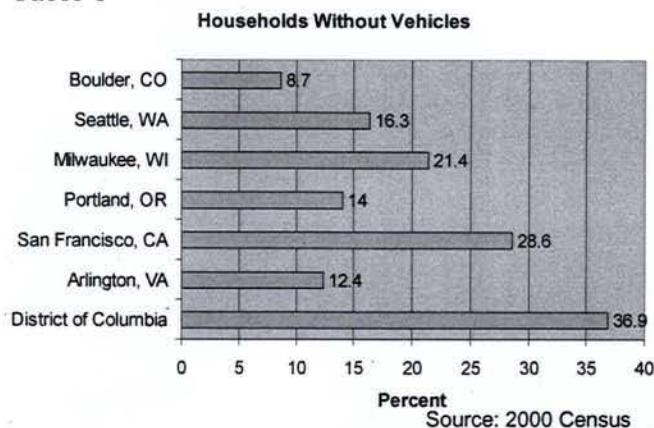
## The Comprehensive Plan

The Comprehensive Plan's goals include promoting transportation demand management, improving efficiency, reducing traffic congestion, promoting alternatives to single-occupancy driving, reducing air pollution, ensuring housing affordability, and conserving energy. DCOP's proposal will advance all of these goals. Moreover, by reducing or eliminating minimum requirements and increasing flexibility, it will improve developers' ability to respond to parking demand in their projects, which is consistent with the Comprehensive Plan goal cited by the FCA.

## Market Forces and Parking Requirements

DCOP and others have argued that developers will build parking even without mandated minimums. Basic economics and anecdotal evidence support this contention. If a car is necessary to get around, developers will make accommodations for it, particularly if they know that on-street spaces are tightly managed and priced. If they do not build enough parking, their project may fail. In fact, many banks evaluate the adequacy of the parking supply when deciding whether to finance a project. Therefore, there is little risk that new construction will not include enough parking. On the other hand, there is great risk that minimums make projects build too much parking. Buildings near Metro stations and/or in walkable

Table 1



<sup>1</sup> Personal communication: Kearstin Dischinger, Lead planner, San Francisco Planning Department, August 25, 2008.

areas may not need parking at all and yet they must still meet minimum requirements that differ only slightly from requirements for automobile dependent areas. It is unreasonable and counterproductive for the government to mandate unnecessary parking when the negative consequences of it are so well established.

The FCA testimony then asks, if market forces are to be trusted, why are maximums necessary. A number of considerations support the use of maximum limits. First, experience suggests that developers are more likely to provide too much, rather than too little parking (see Brian O’Looney’s testimony on Columbia Heights). The establishment of maximums would reflect informed judgment that protects the public interest and fulfills Comprehensive Plan goals that would be undermined by developments with excessive parking. The Comprehensive Plan’s goals to provide alternatives to the use of single-occupant autos, support increased use of transit and make the most of Metro station investments are directly undermined by too much parking. The research described above, under the section “Why We Care,” supports this notion.

## Demographics

Walkable, urban neighborhoods are desirable places to live. A 2003 survey found that 59% of Americans would prefer to walk more as opposed to drive everywhere, particularly the elderly.<sup>2</sup> Further, national estimates of future housing demand indicate that the existing supply of large lot single family housing will be more than adequate in 2025, but millions of new attached and small lot houses will need to be constructed to meet demand.<sup>3</sup> Indeed, as gas prices have risen, exurban and suburban locations most dependent on the car have suffered the greatest loss in property values, while urban locations have largely proven to be resilient.<sup>4</sup> D.C. home values rose by 7% in 2007, while many surrounding jurisdictions lost value or experienced barely half of D.C.’s rise.<sup>5</sup> The recent book *Growing Cooler*, published by the Urban Land Institute, contains even more evidence supporting the conclusion that urban, walkable communities are enjoying an enormous increase in popularity among a variety of people. With its strong transit system, D.C. is in a unique position to benefit from this trend. To reap the full reward of this, the city cannot continue mandating more parking than needed. These mandates impose serious obstacles to the kind of development that responds to the growing demand for urban lifestyles.

## Spillover Parking

Given the choice between a free or cheap parking space and an expensive one, a rational car-owner will always choose the free or cheap one. Building additional expensive spaces does not change the equation. In an urban environment, off-street spaces are expensive while on-street spaces, particularly in residential neighborhoods, are cheap or free. Forcing developers to build large amounts of off-street parking may reduce its market price somewhat, but it will never become cheap or free because of high construction costs and land prices (a parking space can cost \$20,000 - \$50,000). Minimum parking requirements have not solved and will not solve spillover parking demand. The best and most direct solution is improved on-street management and pricing in areas susceptible to spillover.<sup>6</sup> The pilot programs conducted by DDOT managing residential on-street parking around the Nationals Stadium and Columbia Heights DC USA retail center demonstrate that DDOT is developing new tools to address this issue.

---

<sup>2</sup> *Growing Cooler: the Evidence on Urban Development and Climate Change*, Reid Ewing, et al. Urban Land Institute. 2008. p. 27.

<sup>3</sup> Arthur C. Nelson, “Leadership in a New Era.” *Journal of the American Planning Association*, Vol. 72, Issue 4, 2006, pp. 393-407.

<sup>4</sup> “Gas Prices Apply Brakes To Suburban Migration,” by Eric Weiss, *The Washington Post*, Aug. 5, 2008; *Driven to the Brink: How the Gas Price Spike Popped the Housing Bubble and Devalued the Suburbs*, by Joe Cortright, CEOs for Cities, May 2008.

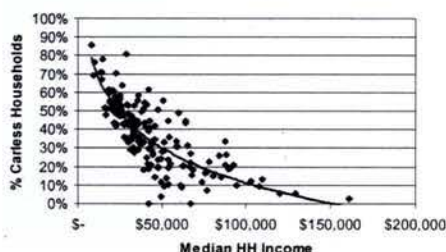
<sup>5</sup> “Stagnant Market Has Ups, Downs Across Region: District Held Own Against Suburbs,” by Barbara Ruben *The Washington Post*, April 24, 2008.

<sup>6</sup> For similar analysis, see: “Suburbanizing the City: How New York City Parking Requirements Lead to More Driving.” By Rachel Weinberger, et al. *Transportation Alternatives*, August 2008.

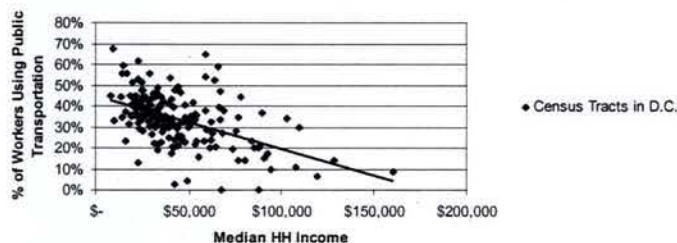
## Transit Accessibility

The FCA testimony criticizes CSG for its statement that D.C. residents probably live within a ¼ mile of a bus stop. This criticism is unfair because according to DCOP, *all* D.C. residents live within a 5-minute walk of a bus stop and as the attached map shows, the vast majority of D.C.'s land area lies within a one quarter mile of a stop.<sup>7</sup> CSG's statement reflects the facts. The FCA also raised concerns regarding the convenience of transit for certain groups of people and the accessibility of transit in lower income neighborhoods. As the charts below show, there is a clear correlation in D.C. between income and car ownership as well as between income and public transportation usage. Areas with lower incomes experience less car ownership and more public transit use.<sup>8</sup> In fact, for low income single parent households, research shows that these families tend to have even lower rates of car ownership.<sup>9</sup> Low income households in D.C. stand to benefit the most from reduced housing costs and increased walkability supported by more appropriate parking policies. Lower income households would also benefit more from improvements to public transportation, which developer payments to DDOT under DCOP's proposal would facilitate. Finally, the FCA testimony seems to assume that the proposal will force everyone to give up cars and rely on transit. This is simply incorrect; while supporters of the proposal hope that reduced minimum requirements would curtail traffic growth in D.C., there is an enormous difference between not requiring parking and banning cars.

Low-income Areas Have More Carless Households



Low-income Areas Use Public Transportation More



## Final Comments

A clear-headed understanding of the proposal, market forces, the unique characteristics of D.C.'s population, and the research literature on parking policy make a strong case for DCOP's idea. This evidence has been presented by DCOP, by CSG in its testimony and comments, as well as by numerous residents at the hearing on July 31<sup>st</sup> and a large number of written comments from residents. The FCA testimony, on the other hand, describes its concerns but provides little or no evidence to back up its claims other than personal perceptions. We ask that the Zoning Commission decides in favor of this proposal considering facts about D.C.'s low car ownership rates, high transit ridership, trends in the popularity of urban living and research evidence.

Thank you for your consideration.

Sincerely,

Cheryl Cort  
Policy Director

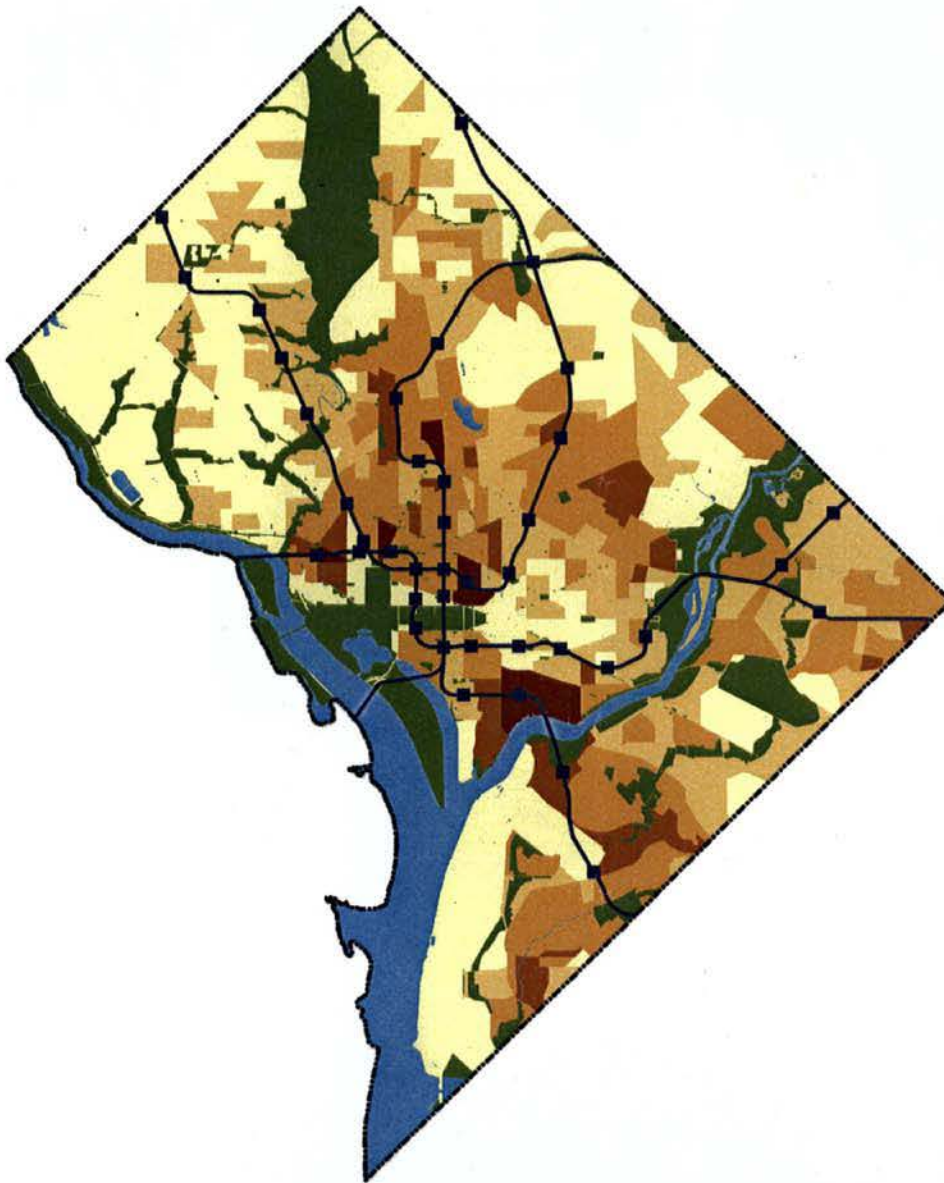
Patrick Lynch  
Policy Fellow

<sup>7</sup> D.C. Office of Planning, "Transit-Oriented Development: a Strategy for D.C." presentation, April 2, 2002.

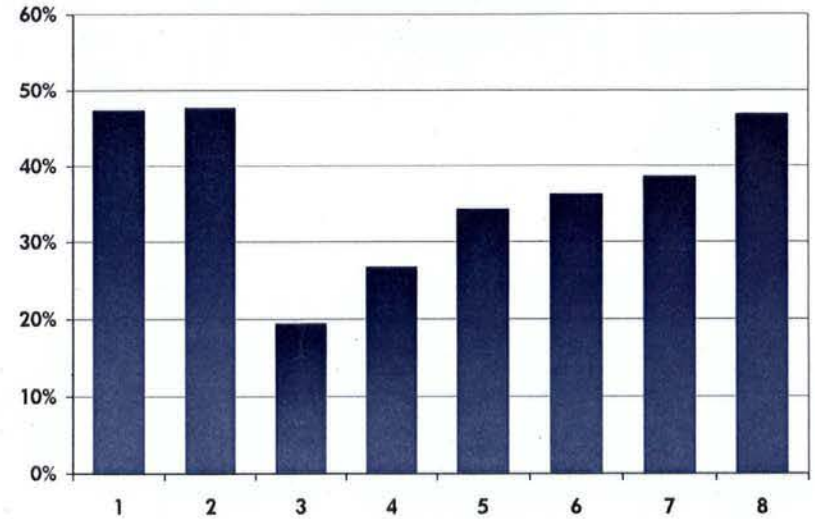
<sup>8</sup> See: "Transportation issues for Low-income populations" by the National Capital Region Transportation Planning Board Access for All Advisory Committee, July 19, 2006; and *The Affordability Index: A New Tool for Measuring the True Affordability of a Housing Choice*, by Center for Transit-Oriented Development and Center for Neighborhood Technology. Brookings Institution, Jan. 2006.

<sup>9</sup> "Daily Travel by Persons with Low Income." By Elaine Murakami and Jennifer Young, Nationwide Personal Transportation Survey Symposium, October 26, 1997.

# Life Without a Car? Possible and Popular in D.C.

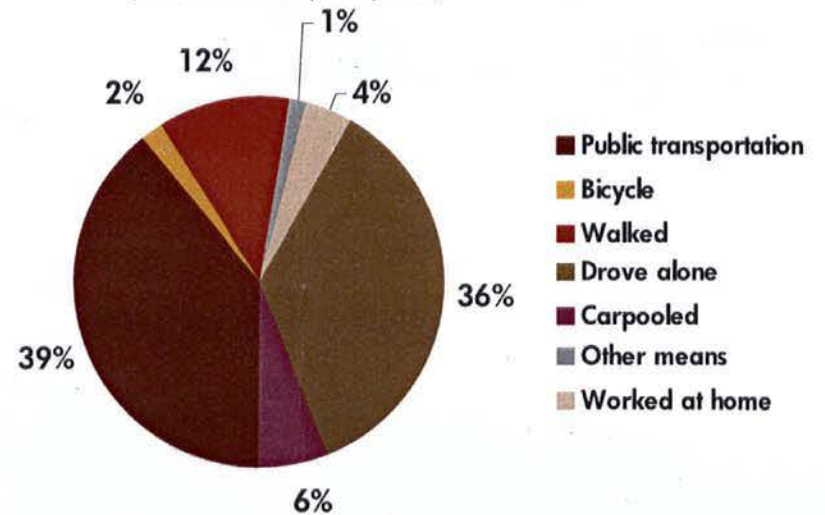


**% of Households with No Vehicle by Ward**  
(US Census 2000)



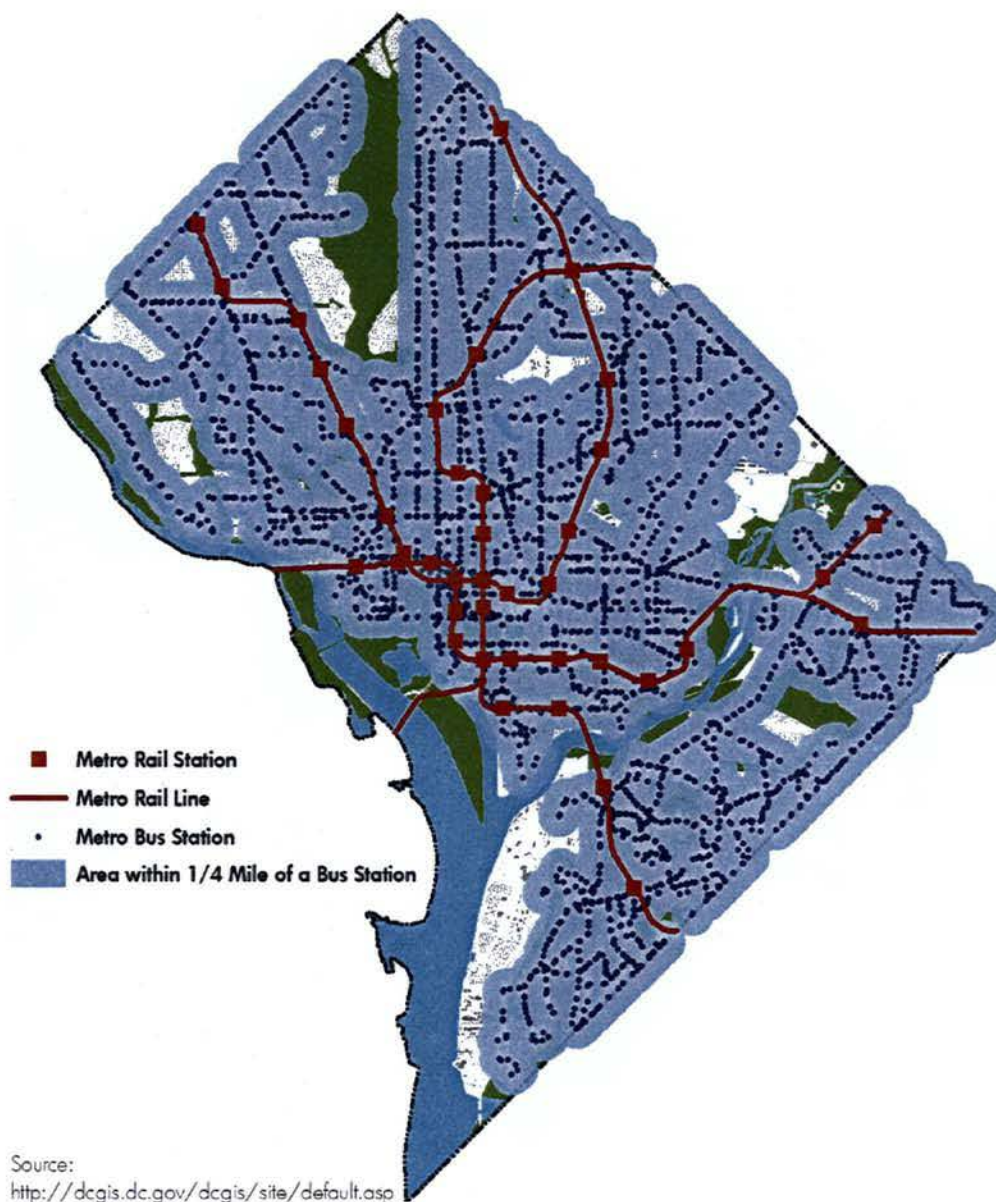
**How D.C. Workers Travel to Work**

(American Community Survey 2006)



COALITION FOR  
SMARTER GROWTH

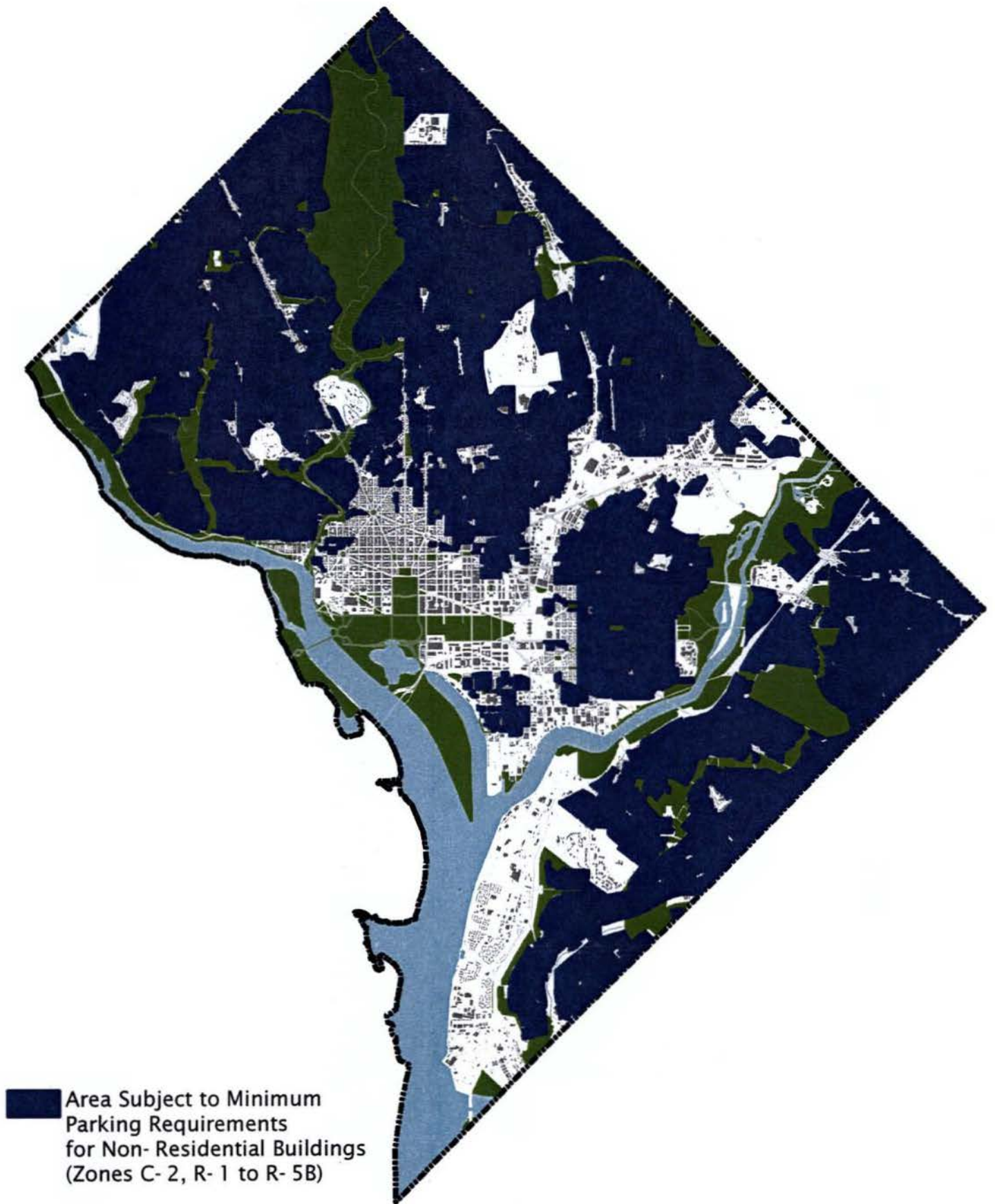
# Public Transportation Accessibility in D.C.: The Facts



## Statistics from the Office of Planning

(Presentation Entitled "Transit Oriented Development: Smart Growth in the Nation's Capitol," 4/2/2002)

- 39 Metro Stations in the District
- 29 Metro Stations are outside the downtown core
- 250,000 people (44%) live within 5 minutes of a Metro Rail Station
- 400,000 people (70%) live within 10 minutes of a Metro Rail Station
- **All** residents live within 5 minutes of a bus line
- 40% of D.C. residents commute using transit
- 15% of D.C. residents commute by foot, bicycle, or taxi



Area Subject to Minimum  
Parking Requirements  
for Non- Residential Buildings  
(Zones C- 2, R- 1 to R- 5B)