

Prepared Testimony of Allen Greenberg

Regarding: Title 11, Zoning Regulations – Comprehensive Text Revisions
Subtitle C – General Procedures (Parking)
Case No. 08-06A

Before the Zoning Commission for the District of Columbia
November 12, 2013

Introduction

The Zoning Commission should seek to bring balance to the transportation system in the Washington, DC metropolitan area through policies that prioritize transit, bicycling, and walking over single-occupancy vehicle (SOV) travel. Projected development in this region, and especially in the urban core, requires that SOV travel be suppressed and transit services and non-motorized travel be bolstered for gridlock to be averted.

Today, the Zoning Commission has a rare opportunity to revise the zoning regulations in a way that would substantially improve housing affordability in and provide environmental benefits to the District, and would allow the construction of new developments that are as transit accessible, walkable, well functioning, and charming as many of the District's historic developments that were built before today's off-street parking requirements made their construction illegal.

Recommendations

I urge the Zoning Commission to move in the direction proposed by the Office of Planning (OP) to reduce onerous minimum parking requirements, especially in transit-proximate developments. The Zoning Commission should go beyond OP's recommendations, though, by eliminating parking minimums entirely in such areas (and also throughout the city). Providing more parking than market conditions warrant, which is the only purpose that minimum parking requirements serve, causes housing and retail development to be less compact and transit accessible and significantly more expensive than they otherwise would be. Requiring that development be oriented to accommodate automobile parking presents hazards to pedestrians and bicyclists, and delays bus riders in traffic queues caused primarily by SOVs.

While, as stated above, parking minimums should be abolished citywide, OP is correct in recommending that alley access be a precondition for retaining parking requirements in single-family dwellings. Alley access should also be a precondition for minimum parking requirements applying to other uses, especially if only a few parking spaces would otherwise be required. The detrimental impacts on community design of having to accommodate parking for a de minimis number of spaces (e.g., fewer than four) would clearly exceed any perceived benefits, especially with curb cuts eliminating on-street parking and endangering pedestrians, and paving to allow parking access (typically entailing more space than needed for the parking itself) destroying precious green space.

For off-street parking provided by developer choice or otherwise still required, good parking design standards can somewhat reduce the negative impacts of car parking on the pedestrian environment and are important to transit-oriented development. Bicycle parking requirements encourage cycling, which provides affordable, healthy, and environmentally-friendly transportation. I support the Zoning Commission improving parking design standards and imposing additional minimum bicycle parking recommendations, as included in OP's proposal.

Why Curtailing Minimum Parking Requirements is So Important

Off-street parking requirements interfere with adaptive reuse of older buildings and are an anathema to affordable housing. Requiring the construction of parking in excess of market demand has been shown, through extensive research, to add between \$52,000 and \$117,000 to the price of housing units—an amount exceeding the entire housing budget of many District minimum wage workers—and guarantees more car ownership, driving, traffic, and air pollution than if such parking were not mandated. Minimum parking requirements force developers to subsidize cars at the expense of these other modes, and harm those seeking more affordable housing who are willing to live car-free, relying on carsharing and taxis for the occasionally necessary personal car trip, by requiring them to pay more for housing to subsidize car owners.

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

Managing on-street parking to deal with the influx of demand from new residents is different from managing it to deal with stadium visitors, but the same basic challenges exist in each case and similar tools to those deployed at the baseball stadium may be used to address this new challenge, which is a much less substantial challenge than that which was presented by the baseball stadium and successfully addressed by DDOT.

OP is right to propose reducing minimum parking requirements in transit-proximate developments, but for all the reasons above, such requirements should be eliminated entirely. I urge the Zoning Commission to promote transit-accessible and affordable housing, adaptive reuse of older buildings, and compact community development by eliminating minimum parking standards, imposing parking maximums and new off-street parking design standards, and requiring sufficient bicycle parking, all consistent with the Comprehensive Plan Amendment Act of 2006.