

Prepared Testimony of Allen Greenberg

Regarding: Title 11, Zoning Regulations – Comprehensive Text Revisions
Subtitle I – Downtown Zones (Parking)
Case No. 08-06A

Before the Zoning Commission for the District of Columbia
November 14, 2013

Introduction

As I testified before you two days ago, I am here to urge the Zoning Commission to help 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 the downtown core, especially, requires SOV travel to be discouraged so as to avoid downtown gridlock and to better accommodate transit and non-motorized commuters.

Put simply downtown DC has plenty of space on its sidewalks and in its buildings to accommodate more people, but very little space on its roadways to accommodate more cars. Minimum parking requirements hurt bus riders and non-motorized travelers by encouraging car ownership and use. Given today's high levels of downtown congestion, and the impacts of parking requirements on auto ownership and use, the first necessary step for DC's zoning code should be to follow the pearl of wisdom: "If you find yourself in a hole, stop digging."

Recommendations

I commend the Office of Planning (OP) for proposing the elimination of minimum parking requirements in the downtown core and urge the Zoning Commission to enact this recommendation. As I testified two nights ago, providing more parking than market conditions warrant, which is the only purpose that minimum parking requirements serve, causes office, retail, and housing 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 commuters trying to get to and from work—who are disproportionately lower-wage DC residents—in traffic queues caused primarily by wealthier suburban SOV commuters.

In its September 16, 2010 testimony to the Zoning Commission, the District Department of Transportation (DDOT) proposed parking maximums that reflect the carrying capacity of the street network and the effect of additional allowable and projected development on reaching or exceeding that carrying capacity. DDOT's original proposed maximum of a one space per 1,000 square feet of development in what it defined as transit zones and three spaces per 1,000 square feet elsewhere is still far less aggressive than Seattle's standard of one space per 1,000 everywhere and San Francisco's 0.233 spaces per 1,000 square feet downtown. Given that the special exception process is always available to gain approval to exceed parking maximums, and indeed it would only be through such a process that a traffic impact analysis for providing

excessive parking could be demanded, there is every reason to adopt and not weaken DDOT's original very modest recommendations, if not to go substantially beyond them as other cities have.

Downtown roadway capacity is very constrained and while we don't want to force the market to provide more parking than users might desire, we also don't want to allow new developments to contribute disproportionately to traffic tie-ups by oversupplying parking (referred to by parking guru, UCLA Professor Donald Shoup, as "a fertility drug for cars") even if developers want to do so.

Another approach worth considering is capping the total number of downtown parking spaces, which has been a common strategy in European cities. Finally, the Zoning Commission should consider requiring all new parking constructed in downtown to be paid for directly by the user of the parking (the employee or retail customer), as a condition for an occupancy permit.

Rationale

Unlike in the neighborhoods, parking spillover onto downtown streets isn't a problem. Meter rates can be fine tuned—as is being done today in San Francisco, Los Angeles, and Chicago—to ensure parking availability on the street at all times. And there is certainly no shortage of downtown garages that are open to the public.

Parking owners, like owners of other commodities, manage to supply. That is, just like a hotel strives to make the most use of its available rooms and airlines try to fill all seats on a flight, building owners will attempt to make use of whatever parking they have.

Minimum parking requirements force developers to saturate the market with parking, and once constructed, owners typically prefer to get something for their parking assets (even if only slightly higher rates for bundled leases on office, retail, or housing space) than nothing at all. Put simply, then, demanding more parking directly causes more car trips. If that isn't what DC wants, then we should stop demanding it. There is an enormous amount of evidence that parking pricing works to improve travel efficiency, but pricing isn't a viable management tool when the market is saturated. Instead, too much parking just makes for price cutting competition among suppliers, and cheap parking means lots of extra driving.

Similarly, if we're worried about too many cars, even after reversing a policy of forced over supply through parking minimums, then we should address that directly by limiting the number of cars we accommodate by building new parking, instead of telling businesses and residents not to come here (by forcing reduced building sizes because of traffic concerns).

As noted earlier, parking maximums are necessary to prevent gridlock. The region anticipates substantial growth and the District, appropriately, seeks to accommodate its fair share of such growth. Because of the District's historic land use patterns, high concentration of Metrorail stations and extensive Metrobus network, it is well equipped to the task. Its success, though, is contingent upon attracting new residents and business activities that rely substantially less on car travel and more on transit than in the past.