

Comments of Marilyn Simon
Zoning Commission Case No. 08-06A, ZRR, Subtitle C

DC's Minimum Parking Requirements Do Not Increase Housing Costs

A single paper was the basis for the Office of Planning's claim that minimum parking requirements increase housing costs in its November 5, 2010 Hearing Report on its proposed parking regulations. The paper was seriously flawed and the underlying assumptions in this paper do not apply to DC's current zoning regulations.

The cited paper provides no support for the claim that our current, low minimum parking requirements increase housing costs or that OP's proposed reductions in the minimum parking requirements would increase the supply of affordable housing.

The paper (Allen Greenberg, "How New Parking Spaces May Effectively Increase Typical U.S. Urban Housing Total Unit Costs by \$52,000 to \$117,000," November 15, 2004, unpublished) cited by OP has been introduced into the record as Exhibit No. 327.

The analysis in only paper cited by OP to support its claim that minimum parking requirements raise housing costs does not apply to DC's current zoning regulations and does not support OP's position.

The Factors Discussed in the Cited Paper are Not Relevant to DC's Zoning Regulations

In this submission, I describe why each of the factors discussed in this paper is inapplicable to DC. While there was testimony in support of OP's proposal to change the minimum parking requirements based only on the claim that this will increase housing affordability, the Office of Planning has provided no credible evidence that their proposal will, in fact, increase housing affordability.

For the reasons discussed below, the following characteristics of DC's zoning regulations and development render the conclusions of this paper irrelevant to the current discussion of the relationship between housing costs and minimum parking requirements:

- DC's current minimum parking requirements for most apartments range from one space for every two units to one space for every four units, well below vehicle ownership rates in every ward;
- Most of our parking for multifamily housing is built below ground, and does not count in the calculation of allowable FAR;
- Most of our parking for multifamily housing has either alley access or a single curb cut; and
- Much of the parking for single family houses is accessed from an alley, with a variance possible if it is not possible to provide access for parking.

Discussion of Claimed Relationship between Minimum Parking Requirements and Increased Housing Costs

(1) Claim: Lost curbside parking due to additional curb-cuts increasing costs by \$4,921 to \$24,607 per unit:

The paper assumes that minimum parking requirements result in, on average, one extra curb cut for every four off-street parking spaces provided, reducing the availability of on-street parking.

In DC, most of the parking for multifamily housing is underground and served by either an alley or a single curb cut. Therefore, there is not a significant decrease in curbside parking when the developer of an apartment building provides off-street parking. In the paper, the loss of on-street parking is assumed to add approximately \$5,000 to \$25,000 per unit to housing costs.

For the reasons stated above, this would not be a factor in evaluating DC's parking requirements.

(2) Claim: Increased infrastructure costs of \$11,950 to \$32,153 per unit:

The paper also assumes that to meet minimum parking requirements, developers must reduce the density of their projects. Based on this assumption, the author further assumes that there is an increase in public infrastructure costs as average density in the District is assumed to decline, making it more expensive, per unit to provide the public infrastructure.

But providing off-street parking for multifamily housing in DC does not result in a reduction in the density of the project. For multifamily housing, parking is largely underground and is not counted as part of the density calculation. For single-family housing, where off-street parking is generally accommodated in the rear yard, there also is no decrease in density. In the paper, the reduction in housing density is assumed to add \$12-\$32,000 per unit in housing costs based on higher infrastructure costs.

For the reasons stated above, this would not be a factor in evaluating DC's parking requirements.

(3) Claim: Direct cost of providing unnecessary off-street parking spaces of \$29,528 to \$49,214 per unit:

The paper also assumes that residents who do not use the off-street parking contribute to the construction and maintenance of the spaces that are required.

DC's minimum parking requirement is one space for every two to four units, and the regulation does not cause a shortage of housing units without parking. In addition, there is an ample supply of housing without parking built prior to the zoning regulations, or where the requirement was waived, so there is no reason to believe that the parking requirements would compel a car-free household to rent or purchase a parking space. Direct costs of the parking are assumed to add \$30-\$50,000 per unit in housing costs (with DC's parking requirement of 0.25 to 0.5 spaces per unit, this translates to as much as \$120,000 to \$200,000 per required parking space).

For the reasons stated above, this would not be a factor in evaluating DC's parking requirements.

(4) Inducement of residents to buy cars they cannot afford, thereby reducing their mortgage loan eligibility, increasing housing costs by \$10,000 for the each household and \$1,080 for their neighbors:

The paper also assumes that minimum parking requirements will result in an increase in car ownership, and with that increase in car ownership and an assumed associated increase in debt, there will be a decrease in mortgage loan eligibility, making housing less affordable.

There is no evidence that minimum parking requirements of 0.25 to 0.5 spaces per unit would induce responsible prospective home purchasers to buy vehicles that they cannot afford, thereby increasing their loan costs, and putting housing out of reach. For example, a recent study by the New York City Department of City Planning finds that minimum parking requirements do not determine car ownership patterns.¹ Reduced loan eligibility is assumed to add about \$11,000 per unit to housing costs for the residents and their neighbors.

For the reasons stated above, this would not be a factor in evaluating DC's parking requirements.

Summary: Since the underlying assumptions do not hold in DC, the estimates of the increased housing costs, other than the cost of parking paid for by those who choose to buy or rent spaces, cannot be attributed to our minimum parking requirements.

¹ "Residential Parking Study: Automobile Ownership, Rates and Off-Street Parking Requirements in Portions of New York City: Manhattan CDs 9-12, the Bronx, Queens and Brooklyn," New York City Department of City Planning, March 2009.

Other Factors

DC's minimum parking requirements do not make it difficult to find housing without a bundled parking space. There is a large stock of housing that predates our current zoning regulations or was not subject to a parking requirement, and the zoning regulations multifamily housing are significantly less than one space per unit, well below our average District-wide vehicle ownership rates of 0.9 vehicles per household.

DC's Zoning Regulations provide for flexibility when parking would be difficult to provide on-site or when the required parking is not likely to be needed: Where it can be demonstrated that a particular building is unlikely to need even that amount of parking, or where there are special circumstances making provision of the required parking particularly costly, our current zoning regulations allow the developer to seek a special exception or variance to reduce the requirement.

With such low minimum parking requirements, it is unlikely that any car-free tenant would be required to pay for a parking space due to the zoning requirement. And our historic housing stock means that there are apartments, rowhouses, duplexes, and single-family homes that have little or no off-street parking. This is not a market where anyone is compelled to buy parking in order to procure housing.

Summary

The Office of Planning has not provided any reasonable support for their claim that our minimum parking requirements of 0.25 to 0.5 spaces per unit for multi-family housing increase housing costs, other than the cost of a parking space paid for by households that require parking.

Given DC's current minimum parking requirements, which are far below vehicle ownership rates in DC, and far below the minimum parking requirements in neighboring Arlington, which requires at least 1.125 spaces per unit (providing adequate parking for Arlington's residents and shared parking for their visitors), our parking requirements would not be a cause DC residents to be unable to find housing where they were not required to also buy or rent a parking space.

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TABLE SUMMARIZING ASSUMPTIONS OF PAPER AND RELEVANT CONDITIONS IN DC

Greenberg Claim	Relevancy to the District of Columbia	Relevancy to Analysis of DC's Zoning Regulations
Lost curbside parking due to additional curb-cuts: Increase in housing costs of \$4,921 to \$24,607 per unit	Parking at apartment buildings in DC would not require the number of curb-cuts assumed.	This would not be a factor in evaluating DC's parking requirements
Increased infrastructure costs due to parking requirement related reduction in density: Increase in housing costs of \$11,950 to \$32,153 per unit	The reduction in density due to required parking was based on the assumption developers must reduce the density of their projects because the required parking would either be surface parking or above ground structured parking. That is generally not the case for large DC apartment or mixed use development.	This would not be a factor in evaluating DC's parking requirements
Direct cost of providing unnecessary off-street parking spaces: Increase housing costs by \$29,528 to \$49,214 per unit	No evidence was provided to show that, due to minimum parking requirements of 0.25 to 0.50 spaces per unit, car-free households are forced to buy or rent parking spaces that they cannot rent or sublet.	This would not be a factor in evaluating DC's parking requirements
Minimum parking requirements of 0.25 to 0.5 spaces per unit will Induce residents to buy cars they cannot afford, thereby reducing their mortgage loan eligibility: Increase housing costs by \$10,000 for the each household and increase their neighbors' housing costs by \$1,080	There is no evidence that minimum parking requirements of 0.25 to 0.5 spaces per unit would induce responsible prospective home purchasers to buy vehicles that they cannot afford.	This would not be a factor in evaluating DC's parking requirements