



Testimony before the
D.C. Zoning Commission

RE: Case No. 08-06A Subtitle I – Downtown
Support for the elimination of parking requirements

By Cheryl Cort, Policy Director
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Good evening Chairman Hood and Commissioners:

We wish to express our support for the proposed reforms to the 1958 zoning code which would eliminate minimum parking requirements from the downtown. We agree with this proposal is particularly appropriate given the dynamics of the Downtown zone. The area has the highest level of transit service (a near perfect score of 99 for its transit score, and a 97 Walk Score) in the city, along with high densities and low rates of car ownership. Thus not artificially increasing the parking supply through minimum parking requirements builds on the strengths of downtown. We cannot continue significantly grow the population and number of jobs downtown if we rely on personal vehicles as a leading means of access and mobility. The streets simply do not have the capacity. Encouraging or requiring parking for individual vehicles works against optimizing the limited roadway capacity with more efficient travel modes such as high capacity transit service. It also consumes valuable space.

While the proposed revisions to Subtitle I's parking regulations allow for the personal vehicle to remain an important transportation choice for many residents and visitors, the reforms also recognize that a large share of DC residents do not depend on getting around by owning a personal vehicle. Roughly half of downtown residents do not own a car, according to the Census. For renters it's significantly higher (see attachment).

Rather than the zoning code attempting to predict how much parking a specific development might need, we think it best to leave this prediction up to the developer who has a vested interest in the project succeeding. The justification for the creation of parking minimums in the first place was to prevent spillover parking demand on public streets. Given that on-street parking for residents is highly limited in downtown, the case is even clearer for removing parking mandates. Even where there are pockets of RPP zones, if a new residential development is marketing to a car-owning household, it will build the parking required to secure the lease or sale since on-street parking would be highly unreliable. The government is not in a good position to predict how much parking a particular development might need, but retaining a minimum requirement runs the risk of building too much parking. The harm in building more parking than people want to buy, rent or use is that it wastes space, increases costs, and subsidizes car ownership since the full cost of constructing a parking space is often not paid by the user.

Encouraging alternatives to driving and car ownership have many public benefits, thus it's something that public policy should support. In addition to the harms of pollution and crashes generated by driving, traffic congestion downtown calls for a more efficient use of limited public space to provide access to an

increasing number of people traveling into and around downtown. There is only so much room for vehicles on existing roadways. This limited space should be available to those who need a personal vehicle for a specific kind of trip or mobility need, or for more efficient modes like transit, walking and bicycling. For those who do not need to drive a personal car, we should encourage attractive alternatives. Part of this encouragement means supporting better transit, walking and bicycling. It also means supporting convenient options like carsharing. Mandating minimum levels of personal vehicle parking works against these encouragements and adds unnecessary traffic. Parking supply, especially when the user does not pay the full cost, will generate additional vehicle trips. Thus by limiting and managing the supply of parking, traffic can be reduced and the efficiency of the transportation system enhanced. Drivers who need to drive also benefit from this because they will compete for space with fewer motorists.

Years of research and experience show that eliminating parking minimums and effectively managing on-street parking, especially downtown, are appropriate approaches to reducing traffic congestion while fostering growth and increasing access and travel choices. Many cities have removed parking minimums from their downtowns. We should recognize that we already have a partial elimination of parking minimums downtown in that office space is not required to build parking. Despite no minimums, developers continue to build parking for office workers. We can see that this policy alone does not either prevent the market from adding to the parking supply. Nor does it adequately address the negative impacts of encouraging single occupancy vehicle travel in downtown when many drivers could be encouraged to opt for alternative modes of transportation.

Not only is removing parking requirements a sound approach, we also ask that the Zoning Commission revisit setting maximums. We appreciate and support the proposal to require modest mitigation measures if the level of parking supply excessively exceeds the minimum (or what it would be for the zone if the requirement is removed as for downtown). We agree that the threshold should be twice the base zone parking requirement, not 1.5 times, and not adding in the transit proximity reduction as part of the minimum floor.

1956 Lewis report, which formed the basis of the 1958 zoning code, cites the upward trends in car ownership, increased fuel consumption, and declining transit ridership as reasons for off-street parking requirements. Today, we see the other end of those trends – declining rates of driving, a downward trend in fuel consumption, a larger share of young adults not obtaining drivers licenses.¹ We also see increased use of transit by DC residents, and bicycle commuting increasing by 2.5 times in recent years. The percent of car-less households is stable and declining. In 2000, just under 37% of DC households did not own a car. Despite a huge influx of 60,000 new and more affluent residents, this number remained stable and inched to 38%. Thus the potential to grow without adding a corresponding number of cars is happening.

Today in DC not owning a car has never been easier. In downtown, transportation choices are many. Eliminating and reducing parking minimums will help support these choices. Walking to nearby stores is increasingly an option for more residents in more downtown neighborhoods. Bicycling is better accommodated on streets enabling more people to take advantage of the opportunity, especially with bikesharing, and smart phone technology makes transit and taxi services more usable. A variety of carsharing services offer a driving option when one is needed. Online shopping and home delivery also offer convenience. I'd recommend buying your baby's diapers online and have them delivered to your front door – whether or not you own a car.

A more walkable neighborhood means that more trips can be taken by walking. Shopping trips tend to be

more frequent and the amount purchased each time less than a car-oriented suburban lifestyle where driving to and from the store can be an unpleasant experience and not feel particularly convenient. When a trip is best taken by car, there are many options that the 38% of DC households use to get around. We should seek to help all DC neighborhoods offer the right mix of stores, services, transit options, carsharing vehicles to allow more DC residents the choice to shed the cost and hassle of personal car ownership. Downtown is becoming a better place to live. It offers more stores and services than just a few years ago, and has experienced tremendous growth. We build on the strength of downtown by seeking to enhance walkability. New vehicle parking will be built in new developments, and existing excess parking will be better shared, especially with the help of the proposed reforms to the zoning code. All these positive changes and existing conditions demonstrate that a minimum parking requirement is unnecessary and potentially harmful.

Thank you for your consideration.

ⁱ See: US PIRG, A New Direction: Our Changing Relationship with Driving and the Implications for America's Future, 2013, http://uspig.org/sites/pirg/files/reports/Moving_Off_the_Road_USPIRG.pdf