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 Washington, D.C. 20015  
 August 27, 2008

Anthony Hood, Chairman  
 Zoning Commission  
 District of Columbia Office of Zoning  
 Suite 210-S  
 441 4th Street, N.W.  
 Washington, D.C. 20001

Re: Zoning Commission Case 08-06-2  
 Proposed Amendments to the Parking Regulations 11 DCMR

**THE SAN FRANCISCO AND PORTLAND EXPERIENCE IS NOT ADEQUATE TO PREDICT  
 THE LIKELY IMPACT OF OP’S PROPOSAL ON D.C.’S NEIGHBORHOODS**

As noted in our earlier filing, in San Francisco and Portland, minimum parking requirements were eliminated only in very limited areas. The experience in San Francisco and Portland is not adequate to predict the impact of OP’s proposal on our neighborhoods, since neither city eliminated minimum parking requirements on a broad scale or near low- and moderate density neighborhoods, and both maintained minimum parking requirements that far exceeded D.C.’s current minimum for most of the area.

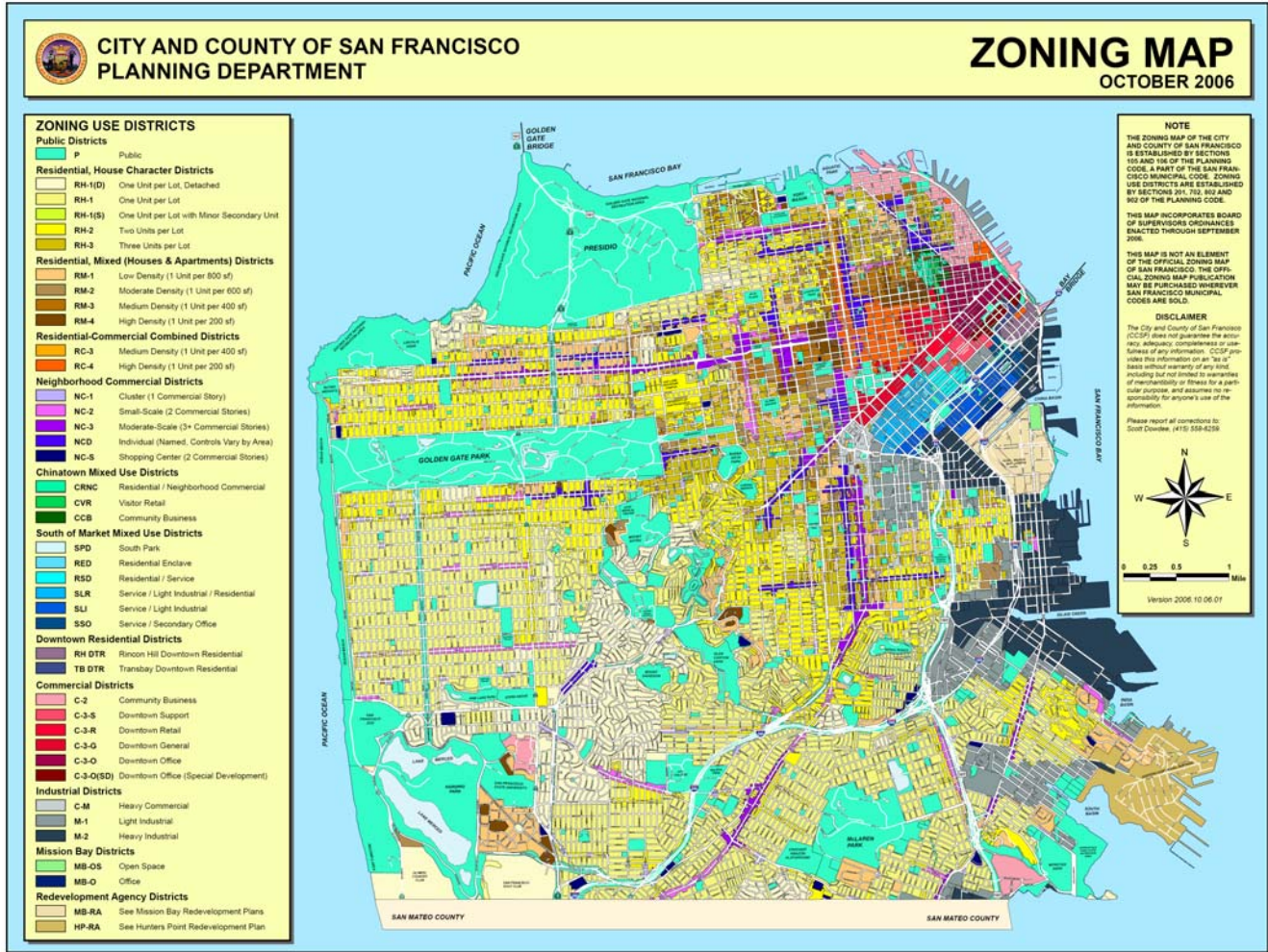
- In San Francisco, Nelson/Nygaard only cites the elimination of minimum parking requirements for multi-family dwelling buildings in the downtown and central business district areas.<sup>1</sup> In fact, for most of the city, San Francisco’s minimum parking requirements are significantly higher than D.C.’s current minimum parking requirements. For most of the city, the requirement is one space per housing unit. This is reduced to one space per four housing units in RC-4 (high density residential-commercial combined) and RSD (residential-service) districts. There is no minimum parking requirement for any uses in the DTR (downtown residential) or C-3 districts. The areas where there are no minimum parking requirements are all downtown, far from lower-density neighborhoods, and therefore, a review of this experience would not provide useful information for evaluating OP’s proposal. For those areas in which San Francisco has eliminated minimum parking requirements, they recognize that the “provision of public parking facilities on an organized basis at specific locations” in those areas in an important prerequisite for implementation of this policy. Exhibit A is a map of San Francisco’s zoning districts. Excerpts from San Francisco’s zoning regulations are attached.
- In Portland, Nelson/Nygaard cites the elimination of minimum parking requirements for multi-family residential and commercial development in the downtown and central business district areas.<sup>2</sup> Outside of low-density neighborhood commercial areas and the highest density central districts, Portland has minimum parking requirements that far exceed D.C.’s current minimum parking

<sup>1</sup> Nelson/Nygaard, Report to the Office of Planning, “Best Practices Review.” In fact, there is no off-street parking requirement for any use in the DTR, NCT, RTO and C-3 districts. In addition, there is no minimum parking requirement in RC-4, residential-commercial, districts if the occupied floor area does not exceed 10,000 SF. For some areas, the Planning Commission can reduce the minimum parking requirement, although there are limits on those reductions. San Francisco Municipal Code, Article 1.5.

<sup>2</sup> Nelson/Nygaard, Report to the Office of Planning, “Best Practices Review.” Portland has eliminated minimum parking requirements in the CN1, CM, CS, RX, CX, and CO1 zones. In the EX district, Portland eliminated the minimum parking requirements for all uses except household living with four units or more, which has a minimum parking requirement of 0.5 spaces per unit, with SROs exempt. The zones where minimum parking requirements were eliminated fall into two categories, the low-density neighborhood and commercial areas, and the highest density Central Commercial, Residential and Employment zones. Portland Zoning Code, Chapter 33.266.

requirements. Exhibit B is a map of Portland’s zoning districts. Excerpts from Portland’s zoning regulations are attached.

**Exhibit A: Zoning Map for San Francisco, California**

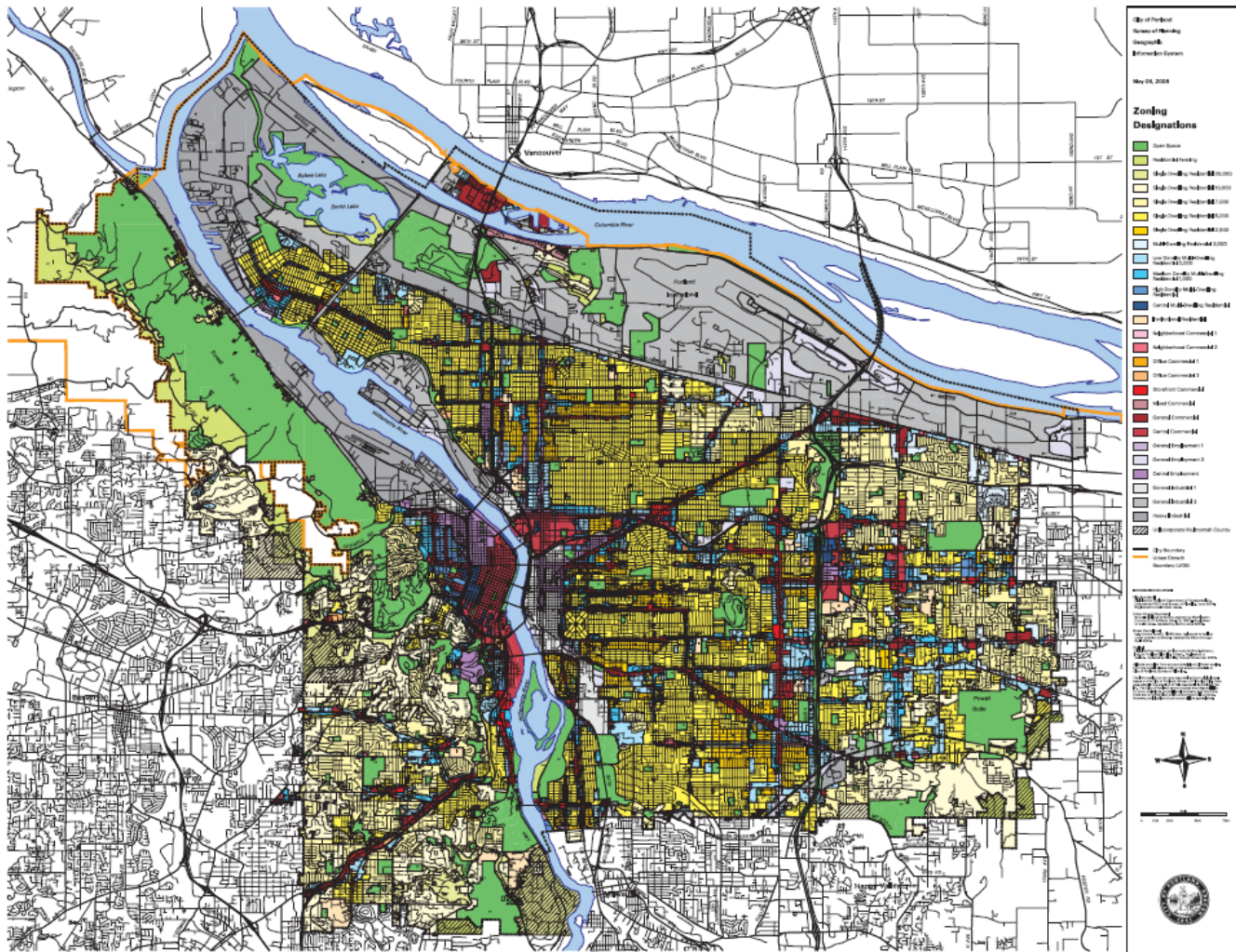


Minimum parking requirements have been eliminated in the following districts:






Downtown Residential Districts		
	<b>RH DTR</b>	Rincon Hill Downtown Residential
	<b>TB DTR</b>	Transbay Downtown Residential
	<b>C-3-S</b>	Downtown Support
	<b>C-3-R</b>	Downtown Retail
	<b>C-3-G</b>	Downtown General
	<b>C-3-O</b>	Downtown Office
	<b>C-3-O(SD)</b>	Downtown Office (Special Development)



### Exhibit B: Zoning Map for Portland, Oregon



Minimum parking requirements have been eliminated in the following districts:

-  Central Multi-Dwelling Residential
-  Central Commercial
-  Central Employment
-  Neighborhood Commercial 1
-  Office Commercial 1

**A REVIEW OF ZONING IN OTHER CITIES THAT  
HAVE “ELIMINATED MINIMUM PARKING REQUIREMENTS”**

At the July 31 Zoning Commission hearing, proponents of OP’s proposal offered several cities as examples of cities that have eliminated minimum parking requirements. These include Coral Gables, Florida; Fort Pierce, Florida; Olympia, Washington; Spokane, Washington; as well as San Francisco; Portland, Oregon; Milwaukee, Wisconsin; and Seattle, Washington,<sup>3</sup> which were mentioned earlier and discussed in my April 16 comments.<sup>4</sup>

In an earlier filing, we presented evidence that most of the cities that have been described as eliminating minimum parking requirements, in fact, generally have minimum parking requirements that far exceed D.C.’s current minimums for most of the city. Those findings are summarized below.

The same is true for Coral Gables, Fort Pierce, Olympia and Spokane. There are some limited exemptions to the minimum parking requirements for some uses in a portion of their central business district, usually on the waterfront, where neighborhoods that might be affected by spillover are limited. For the remainder of the city and for some uses in the central business district, these cities have minimum parking requirements, and they exceed D.C.’s current minimum parking requirements. These findings are summarized in the following table:

**Coral Gables, Fort Pierce, Olympia and Spokane:  
Extent of Exemptions from Minimum Parking Requirements and  
Comparison with D.C.’s Current Minimum Parking Requirements: Residential**

	Comparison with D.C.’s Current Minimum Parking Requirements: Residential	Areas and uses exempted from Minimum Parking Requirements
Coral Gables, Florida	Minimum parking requirement for: Apartments: 3.45 to 13.8 times DC minimum Duplexes: 1.5 to 2 times DC minimum Single Family: same as DC minimum	Exemption from minimum parking requirement for non-residential uses with FAR of 1.25 or less in CBD
Olympia, Washington	Minimum parking requirement outside exempt downtown, waterfront area: Multifamily: 2 to 6 times DC minimum Single family and duplexes: 2 times DC minimum, except in DB, CSH and RMH zones where it is equal to the DC minimum	Exemption from minimum parking requirement in the “downtown exempt parking area” along the waterfront for residential uses or commercial uses with less than 3,000 SF leaseable space.
Fort Pierce, Florida	Minimum parking requirement outside B-4 Business Zone: Multifamily, except public housing for the elderly: 3 to 6 times DC minimum parking requirement Single family: 2 times DC minimum parking requirement Public housing for the elderly: 1 to 2 times DC minimum parking requirement	Exemption from minimum parking requirement in the B-4 business zone, along the waterfront
Spokane, Washington	Minimum parking requirement Multifamily: 2 to 4 times DC minimum parking, higher if 4 or more bedrooms Single family: Same as DC minimum, unless 4 or more bedrooms, in which case the requirement is increased by one space for each bedroom over 3.	Exemption from minimum parking requirements for all uses for a portion of downtown
OP Proposal		Eliminate all minimum parking requirements for residential uses. Eliminate most other minimum parking requirements.

<sup>3</sup> Coral Gables, Florida; Fort Pierce, Florida; Olympia, Washington; and Spokane, Washington were mentioned by Mr. O’Looney, July 31 transcript, p. 200. Milwaukee, San Francisco and Portland were mentioned by Mr. O’Looney at page 200 and by Mr. Zieman at page 166.

<sup>4</sup> My April 16 Comments to the Office of Planning were submitted to the Zoning Commission as an attachment to my July 28 letter.

- Coral Gables zoning regulations include minimum parking requirements for many uses that far exceed D.C.'s current minimum parking requirements, but non-residential uses with a FAR of 1.25 or less in the City of Coral Gables central business district are exempt for the minimum parking requirements. Off-street parking requirements for most residential uses are significantly higher than D.C.'s current minimum parking requirements.<sup>5</sup> A copy of the off-street parking requirements for Coral Gables is attached.
- Olympia, Washington: Olympia, Washington has a minimum parking requirement of one to two motor vehicle parking spaces per unit, unless it is located in the "downtown exempt parking area," which is along the waterfront. New commercial buildings or buildings with expansions of 3,000 SF of leaseable space or more are required to meet the motor vehicle and bicycle parking requirements.<sup>6</sup> A copy of the off-street parking requirements for Olympia, Washington is attached.
- Spokane: Off-street parking is not required in a portion of the central business district.<sup>7</sup> Other minimum parking requirements are significantly higher than D.C.'s minimum parking requirements. Except for SRO's, outside the CBD, the minimum off-street parking requirement for residential household living is one space per unit, plus one space for each bedroom after 3 bedrooms. A copy of the off-street parking requirements for Spokane is attached.
- Fort Pierce, Florida: There are off-street minimum parking requirements except in the B-4 business district along the waterfront. As with the other cities, the minimum parking requirements are far higher than D.C.'s current minimum parking requirements. Two spaces are required for each single family house or duplex. For triplexes, quadraplexes and multi-family housing, 1.5 spaces per unit is required, except for public housing for the elderly, where the requirement is 0.5 spaces per unit. Boarding houses require one space per bedroom. A copy of the off-street parking requirements for Fort Pierce is attached.

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<sup>5</sup> For Coral Gables, off-street parking requirements for single family homes are one space per residence. For townhouses, the requirement is one space for each one-bedroom unit and two spaces for each unit with two or more bedrooms. Duplexes or two-family houses require 1.5 spaces for each one- or two-bedroom unit and two spaces for each unit with three or more bedrooms. The minimum off-street parking requirements for apartment buildings vary with the location and with the number of bedrooms. For efficiencies, one-bedroom or two-bedroom units, 1.5 or 2 spaces per unit is required, depending on the location. 2 parking spaces are required for each 3-bedroom unit and 3 parking spaces are required for each unit with 4 or more bedrooms. In addition, supplemental spaces are required, either 20 spaces or one space for each 15% of the units, depending on the location. By contract, for apartments in most zones, D.C. requires .25 to .50 spaces per unit.

<sup>6</sup> For Olympia, outside the "downtown exempt parking area" on the waterfront, single family homes, duplexes and houses are required to have two spaces unless they are in the high density zones, in which case they are required to have one space. Multifamily dwellings of 3 or more units are required to have 1.5 spaces per unit, and studio apartments are required to have one space per unit.

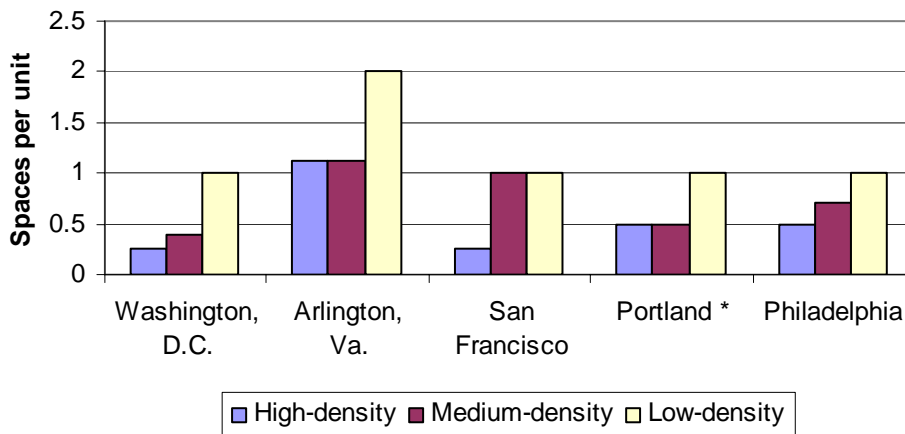
<sup>7</sup> Section 11.19.197(d) provides that "Off-street parking is not required for any use in that portion of the downtown area described as follows: Beginning at the intersection of the centerlines of Division Street and the alley between Second and Third Avenues; thence north to the centerline of Boone Avenue; thence west to the centerline of Monroe Street; thence south to the centerline of Main Avenue; thence west on the centerline of Main Avenue to a point measured one hundred feet perpendicular to the north line of Riverside Avenue; thence generally west on a line parallel with, and one hundred feet north of the north line of Riverside Avenue to the centerline of the Maple Street on-ramp; thence southeast to the centerline of Riverside Avenue; thence westerly to the centerline of Maple Street; thence south on the centerline of Maple Street to the centerline of the alley between Second and Third Avenues extended; thence east to the point of beginning;

San Francisco, Portland, Oregon, Arlington, Virginia and Philadelphia have minimum parking requirements for most areas that are equal to or higher than DC's current minimum off-street parking requirement.

**Comparison of DC's Current and Proposed Parking Requirements with Arlington, San Francisco, Portland and Philadelphia: Residential Uses**

	Comparison with Current DC Zoning Regulations
Arlington, Virginia	Minimum Parking Requirement for Residential Uses: All Zones: 2-4 times the current DC minimums
San Francisco	Minimum Parking Requirement for Residential Uses: Medium density zones: 2 times DC minimums Low- and high density zones: same as current DC minimum
Portland	Minimum Parking Requirement for Residential Uses: Medium and high density zones: higher than current DC minimums Low density zones: same as current DC minimum
Philadelphia	Minimum Parking Requirement for Residential Uses: Medium and high density zones: higher than current DC minimums Low density zones: same as current DC minimum
OP Proposal	Eliminate all minimum parking requirements for residential uses

**Minimum Parking Requirements: Residential**



\* Portland minimum is for high-density residential zones outside of "Central Residential Zone"

Milwaukee, Seattle and Pasadena were also mentioned at the July 31 hearing as examples of cities that have eliminated minimum parking requirements. The following excerpt from my April 16, 2008 comments looks at some of the other cities, and shows that to the extent that those cities have

eliminated any of their minimum parking requirements, that was limited to the downtown area.

The Nelson/Nygaard “Best Practices Review,” in Section II: “Zoning Reform Best Practices,” cites Milwaukee, Seattle and Pasadena as examples of cities that have implemented “reducing/‘tailoring’ minimum requirements.” [See Best Practices Review at pp. 5-6.] The examples of cities that have eliminated minimum requirements include Milwaukee, Seattle, Portland, and San Francisco.” [See Best Practices Review at p. 7.] Arlington, Virginia is cited as an example of a jurisdiction that has reduced parking minimums near Metro Rail stations. [See Best Practices Review at p. 13.] The extent to which these jurisdictions have actually implemented these policies is described below.

- Milwaukee: In the first example, Nelson/Nygaard writes: “Milwaukee, WI has no minimum parking requirements for any downtown land use except high-density housing, where the ratio is only two spaces per three units.” Note that, only for downtown land do they mention the elimination of minimum parking requirements, and there is a minimum for high-density housing downtown, a requirement is twice the requirement that OP is proposing for MDUs within 400 feet of a low or moderate density neighborhood, and actually is four times the minimum when the 50% reduction that OP is proposing is factored in.
- Seattle: In describing the implementation of this policy in Seattle, Nelson/Nygaard only asserts that Seattle allows reductions in minimum parking requirements based on several, very limited factors, has eliminated minimum parking requirements only in the downtown area, and has some reductions in the minimums in mixed-use, dense neighborhoods.
- Pasadena: For Pasadena, the third example in the Best Practices Review, Nelson/Nygaard cites reduced minimums, not an elimination of minimums. The reduction in minimum parking requirements is restricted to the central district and certain transit oriented developments.

### CONCLUSION

The elimination of most minimum parking requirements, as proposed by the Office of Planning, is likely to result in spillover parking problems in many of D.C.’s low- and moderate density residential neighborhoods. The record before the Zoning Commission does not include any studies that demonstrate that the District would benefit from this radical proposal. The Record does not include a clear demonstration of policies that could adequately address the specific spillover problems that will be introduced or exacerbated by this proposal. And, given that the other cities where some minimum parking requirements have been eliminated have implemented this policy only in very small areas, far from low- and moderate-density neighborhoods, evidence based on the experience in those cities is not relevant to the evaluation of OP’s proposed amendment to the parking regulations.

Sincerely,

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Washington, D.C.

Attachment: Minimum off-street parking requirements for San Francisco, Portland, Coral Gables, Olympia, Spokane and Fort Pierce.