

WESTHAMPTON CITIZENS ASSOCIATION

April 16, 2023

(By Email: Matthew.Ebinger@RVA.gov)

Matthew J. Ebinger, AICP

Department of Planning and Development Review, City of Richmond

900 E Broad Street, Room 511

Richmond, VA 23219

Re: Elimination of Minimum Parking Requirements

Dear Mr. Ebinger:

Westhampton Citizens Association opposes the adoption of the proposed ordinance that would eliminate minimum parking requirements from the City of Richmond Zoning Ordinance. Although we applaud the goals of the Richmond 300 Master Plan to create a thriving environment, an equitable transportation network and more affordable housing, we believe that eliminating all minimum parking requirements throughout the entire City of Richmond will do little to achieve these goals and will create unintended hardships on residents of the Richmond metropolitan area. Instead, a more nuanced approach that focuses on the parking needs and character of specific neighborhoods and of specific projects as they are proposed for development will better serve the City's long-term interests.

The Staff Report of the Department of Planning & Development Review states that the parking minimums have contributed to urban sprawl, lack of abundant and affordable housing, and automobile dependence. However, we believe that automobile dependence already existed before the parking minimums were first imposed and that the parking minimums were merely a reasonable response to that dependence. In most areas of the City, that dependence is still very much a fact of life and will not decline or disappear by eliminating the number of parking spaces required for new development projects. Simply put, the City of Richmond does not have adequate alternatives to automobile use by individuals (whether they live within or outside the City) to travel to and from their jobs, stores, restaurants and other locations in the City. This is particularly true in areas such as the Far West End, the Museum District and much of Southside, all of which were developed after the automobile had become the predominant form of transportation. The pattern of development in these areas reflects that fact.

The City of Richmond does not have a subway system or other forms of mass transit such as New York and other major cities that have been cited as precedents for the proposal to eliminate parking minimums. The GRTC bus system serves a very small proportion of residents and areas in the Richmond metropolitan area, and there is little evidence to suggest that this is likely to change in the foreseeable future. It is also not practical to expect persons who live in one area of the City or outside the City and who work downtown or in another area of the City to walk or bicycle several miles to their jobs. In fact, one of the major benefits to living and working in Richmond is the fact that it is so accessible by automobile.

In principle and subject to certain limits, we support allowing the market to determine how neighborhoods are developed rather than imposing clumsy or inflexible government regulation. We also agree that a developer of multifamily properties may be able to charge less for rental apartments if the developer is not required to build parking structures or spaces that are not needed for a particular project. However, except perhaps in those few, relatively small areas of the City where residents actually live, work and shop in the same general area and therefore do not need an automobile for transportation, off-street parking spaces may be necessary, and it is the responsibility of the City to ensure that they are provided if the market does not demand them or a developer would otherwise choose not to provide them.¹

Instead of a “one-size-fits-all” approach of eliminating all minimum parking requirements citywide, we would support a careful review of the minimum parking requirements to reduce them in those areas of the City where they are higher than needed. We would also support, to the extent that the Zoning Ordinance as applied to a specific development project requires more parking spaces than are needed for that project in the neighborhood where it is located, providing the Planning Department, the Planning Commission or other appropriate agency with authority to reduce those requirements on a case-by-case basis, with the opportunity for public input as well. Consideration should be given to a process that does not require the time and cost of requiring a special use permit by City Council or a variance from the Board of Zoning Appeals. We would be happy to participate with Planning Department staff in developing these or other alternatives to the current proposal.

Very truly yours,

Patricia Merrill, President

¹ We noted with interest that, in the public meetings introducing the proposal to eliminate minimum parking requirements, planning staff touted the fact that historically the parking spaces that developers proposed to provide in development projects often exceeded the City minimums and that this showed why minimum parking minimums were unnecessary. However, this really only shows that the minimum parking requirements in those projects were not an impediment to development and did not need to be eliminated or modified. In all of the other development projects, the minimums may have been important to insuring that the public and/or the tenants had adequate off-street parking available.