

Joint Letter on Council Bill 2020-0198

Dear Esteemed Members of City Council,

On behalf of the undersigned organizations, representing 12 row house neighborhood organizations, community development corporations, bike/pedestrian/accessibility/transit advocacy organizations, and environmental organizations, we urge City Council to amend Council Bill 2020-0198 to create stricter provisions to constrain the damage done by driveway curb cuts to the essential character of row house communities. **Minimally, City Council should immediately amend this legislation to apply the curb cut design standards from the RIV into R1A.**

We completely share the City's goals of "improving pedestrian safety, enhancing neighborhood walkability, and promoting non-vehicular mobility." The zoning text amendments proposed in Council Bill 2020-0198 are a step in the right direction of advancing those aims. Under this legislation, developers seeking to build in our row house neighborhoods would no longer face a disincentive to design contextual housing and they could build housing that reflects the character of the neighborhood by right.

However, this legislation doesn't go nearly far enough. As the City Planning's own briefing to the Planning Commission demonstrated, **off-street parking along primary streets in our row house neighborhoods create significant and permanent negative impacts to the fabric of our communities:**

1. **Driveway curb cuts privatize public parking.** Introducing driveway curb cuts for garage access and off-street parking removes public, on-street parking, which is often in high demand in R1A neighborhoods due to their density, for a single private user. At their most basic level, they privatize public space and permanently reduce the supply of public parking in urban neighborhoods. As the City's own Transportation Demand Management guidelines encourage, we should be promoting shared parking strategies where parking can be used by different users throughout the day to reduce the total number of parking spots.¹
2. **Driveway curb cuts destroy our neighborhoods' walkability and make sidewalks less safe and less accessible.** The essential character of dense, walkable residential blocks are permanently impaired by introducing the ingress and egress of vehicles along the public realm and the pedestrian experience. It creates safety concerns for the community, as children and other residents now have to be concerned about vehicles coming and going while they walk down the sidewalk. As the Department of City Planning pointed out in their briefing to the Planning Commission, as many as 39% of deaths from accidental car back-overs occur in residential driveways, parking lots, and complexes.² Very often, the driveways to accommodate these integral garages also

¹ [TDM Guidelines for New Developments](#)

² [Driveway Safety](#)

introduce new slopes to an otherwise flat sidewalk, which can also impair accessibility for people in wheelchairs, people with disabilities, and parents with strollers. Furthermore, residents often park in front of their integral garages, obstructing the sidewalk for pedestrians and people with disabilities.

3. **Off-street parking drives up housing prices.** We share the concerns of City Planning that a single parking space per unit drives up the cost of an affordable housing development by 12.5% on average,³ when we know that the City of Pittsburgh already faces a shortage of over 20,000 affordable housing units that it's trying to address.⁴ Consequently, the current off-street parking requirement creates extra costs that deplete much-needed and already stretched public resources for affordable housing, while giving developers the ability to drive up costs further for market-rate projects, which only exacerbates the challenges of gentrification and displacement that so many R1A neighborhoods are currently experiencing.
4. **Off-street parking undermines the City's goals to reduce single occupancy vehicle trips and further exacerbates our poor air quality.** Studies have shown that residents with guaranteed off-street parking are much more likely to drive to work--even when a viable transit option exists, as it does in most R1A neighborhoods in Pittsburgh. For instance, a study commissioned by Transportation Alternatives found that residents in areas with guaranteed, off-street parking were 45% more likely to drive to a central business district and 28% more likely to take a car to work in general.⁵ These extra vehicle trips cause a negative impact to traffic congestion in dense neighborhoods, in addition to contributing to Pittsburgh's already poor air quality. The City's own Climate Action Plan aims to reduce vehicle miles traveled by 50% per capita below 2013 levels by setting targets for commuter mode shifts away from single occupancy vehicles and towards public transit, walking, and biking;⁶ yet the allowance and requirement of off-street parking in R1A neighborhoods works directly against that City priority and is detrimental to the public welfare.
5. **Driveway curb cuts and integral garages permanently prevent the ability to plant street trees.** According to the City's Climate Action Plan, the City's inventory of nearly 40,000 street trees play a critical role in reducing thousands of metric tons of carbon dioxide emissions, providing shade, reducing the heat island effect, and managing stormwater.⁷ With a typical curb cut at 13 feet wide,⁸ and a typical street tree pit at 10 feet wide,⁹ each curb cut permanently eliminates 1-2 street trees on a primary street, which have additional benefits to the community through beautification, slowing traffic, improving emotional and psychological health, and more.

³ [Parking Requirement Impacts on Housing Affordability](#)

⁴ [Pittsburgh Housing Needs Assessment](#)

⁵ [Guaranteed Parking – Guaranteed Driving:](#)

⁶ [Climate Action Plan | pittsburghpa.gov](#)

⁷ Ibid.

⁸ [Planning Commission](#)

⁹ [Tree Planting Request Form](#)

- 6. Integral garages demote neighborly interaction.** Instead of neighbors meeting along the street, new neighbors now pass into and out of their homes without ever having to walk along the street and having the casual, daily neighbor interactions that are critical to building community and vibrancy in row house neighborhoods. They further prevent the “porch culture” that’s so characteristic of R1A neighborhoods in Pittsburgh.¹⁰

With market-rate residential development picking up in many R1A neighborhoods over recent years, the cumulative impact of each individual driveway curb cut will continue to grow, fundamentally changing the character of entire blocks and communities. Consequently, bolder action is urgently needed to give communities the tools they need to ensure new development doesn’t harm the existing neighborhood.

The intent of this legislation is good, but as it stands, this legislation will not change, in any meaningful way, the continued construction of street-level off-street parking, integral garages, and driveway curb cuts in R1A neighborhoods. While the proposed zoning text amendments would end the minimum parking requirement for single family attached uses, making it easier for affordable housing developers to build new projects, the maximum parking requirement remains untouched. Although developers will no longer face a disincentive to avoid off-street parking when they don’t want to provide it, the greater challenge to our communities is that market-rate developers face a much stronger incentive to provide off-street parking because of the demands of wealthier homebuyers. For developers to get their preferred price point, they perceive it beneficial or necessary to offer off-street parking in R1A neighborhoods, and so they will continue to build it if there are no disincentives otherwise. **As this legislation currently stands, driveway curb cuts would continue to be allowable by right along our most walkable rowhouse blocks, and communities will continue to have no tools to prevent them.**

If we’re going to set a goal as a City, we should strive to meet it. The only way to curtail the continued expansion of driveway curb cuts along the fronts of rowhouse blocks is to actively give the community the tools to prevent them. As it stands, these tools do not exist in R1A. One way to provide these tools would be to make off-street parking along primary streets in R1A require a special exception or variance. By either prohibiting or triggering a Zoning Board of Adjustments hearing, communities will have the ability to prevent front-facing integral garages and driveway curb cuts in new construction. Off-street parking accessed from the rear, which already reflects our neighborhood’s built environments, could still be permissible by right under the current maximum off-street parking standards (4).

Minimally, the legislation should immediately incorporate the design standards for residential driveway curb cuts from the RIV in R1A zones as well. Under the RIV’s curb cut standards, garages and parking spaces must be accessed from the rear yard if available.¹¹ When not available, shared driveways with one curb cut are encouraged. While this wouldn’t

¹⁰ [Stoop City: Celebrating Porch Culture in Bloomfield](#)

¹¹ 905.04.G.2.e | [Code of Ordinances | Pittsburgh, PA](#)

stop driveway curb cuts in parcels that lack alleyway access, it goes a step further than this current legislation and would improve it. Since it's already in the Zoning Code, Council should not need to delay on this matter and could immediately move to adopt the language in R1A zones.

In closing, we commend the City for taking this step to protect and advance walkability, safety, accessibility, and mobility, but we can and should go further to realize these goals. The City's own RIV standards provide one immediately actionable way to do so. Other restrictions should be considered, and our organizations are committed to working with the City to think about other steps that might be taken. In the meantime, we urge City Council to apply the RIV curb cut design standards into R1A zones.

Respectfully submitted,



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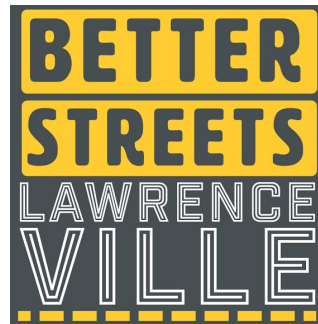


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