



**BALTIMORE CITY
BOARD OF MUNICIPAL
AND ZONING APPEALS**

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MEMORANDUM

To: The Honorable Members of the Land Use and Transportation Committee
From: Justin A. Williams, Interim Executive Director
CC: Geoffrey Veale, Zoning Administrator
Date: October 14, 2025
Re: Council Bill No. 25-0065 – Zoning – Eliminating Off-Street Parking Requirements
Position: **Favorable**

NOTE: Due to timing constraints, this report was prepared by BMZA staff and has not been reviewed or voted upon by the full BMZA Board. The observations and recommendations herein represent staff analysis based on the Board's historic caseload and operational experience.

OVERVIEW

City Council Bill 25-0065 repeals requirements for providing a minimum number of off-street parking spaces per use type, while maintaining parking maximums through a new Table 16-204. The legislation amends, repeals, and renumbers several sections of Article 32, Title 16 (Off-Street Parking and Loading).

BACKGROUND AND BMZA EXPERIENCE

The BMZA has direct and extensive experience with the City's off-street parking requirements through its role in hearing and ruling on requests for variances from off-street parking requirements. Over recent years, the BMZA has received numerous petitions seeking relief from minimum parking requirements across various zoning districts and use types.

The frequency and nature of these variance requests suggest that the current parking minimums often exceed actual parking demand and create unnecessary barriers to beneficial development projects. While the BMZA has not historically maintained data on variance types in an easily tabulable format, staff would assert that parking requirement variances are among the most common requests the Board receives, indicating a systemic issue with the current regulatory framework rather than isolated hardship cases.

EVIDENCE FROM PEER CITIES

Baltimore's proposed reform follows a national trend of cities eliminating minimum parking requirements to address housing affordability, promote economic revitalization, and advance sustainability goals. The experience of peer cities, particularly those with similar challenges as legacy industrial centers, provides compelling evidence for this policy intervention.

Buffalo, New York: A Particularly Relevant Comparison

Buffalo presents the most directly applicable case study for Baltimore. Like Baltimore, Buffalo is a legacy industrial city that has experienced significant population loss (approximately 55% since the 1950s) and has utilized zoning reform strategically to attract investment and reverse decline.¹ Buffalo eliminated citywide parking minimums through its “Green Code” in 2017.²

The results have been quantifiable and substantial:

- 47% of new developments provided fewer parking spaces than the previous code would have required³
- Parking reform legalized more than half of all new homes built in Buffalo post-reform; projects that would have been prohibited or substantially delayed under the old code⁴
- 21% reduction in overall parking provision across 36 major development projects studied in the first two years (502 fewer spaces than previously mandated)⁵
- Enabled adaptive reuse and infill development on sites where parking construction would have been economically infeasible⁶
- One-third of developments began charging separate fees for parking (parking unbundling), ensuring cost savings benefit car-free residents⁷

Buffalo’s experience confirms that parking reform is effective as a revitalization catalyst in legacy industrial cities, not merely a response to high-demand growth markets.⁸

¹ BIPARTISAN POL’Y CTR., ELIMINATING PARKING MINIMUMS IN BUFFALO, NY, <https://cms3.revize.com/revize/hudsonnynnew/Boards%20and%20Committees/Legal%20Committee/2024%20Docs%20and%20Agendas/Eliminating%20Parking%20Minimums%20in%20Buffalo,%20NY%20%20Bipartisan%20Policy%20Center.pdf>.

² Daniel B. Hess, Parking Reform Could Re-Energize Downtowns, UNIV. AT BUFFALO (June 2021), <https://www.buffalo.edu/ubnow/stories/2021/06/conversation-hess-parking-reform.html>.

³ Eric Jaffe, Buffalo Ended Parking Requirements. What Did Developers Do Next?, MEDIUM (May 17, 2019), <https://medium.com/sidewalk-talk/buffalo-ended-parking-requirements-what-did-developers-do-next-bc97bbc29767>.

⁴ Parking Reform Legalized Most of the New Homes in Buffalo and Seattle, SIGHTLINE INST. (Apr. 13, 2023), <https://www.sightline.org/2023/04/13/parking-reform-legalized-most-of-the-new-homes-in-buffalo-and-seattle/>.

⁵ Rachel Bain & Daniel B. Hess, Minus Minimums, 87 J. AM. PLAN. ASS’N 134 (2021), <https://www.tandfonline.com/doi/full/10.1080/01944363.2020.1864225>.

⁶ Parking Reform Could Re-Energize Downtowns, SCH. OF ARCHITECTURE & PLAN., UNIV. AT BUFFALO (June 2021), <https://archplan.buffalo.edu/news/2021/parkingreform.html>.

⁷ *Id.*

⁸ Big Reforms, Big Growth: Buffalo’s Parking Rewrite Pays Off, SIGHTLINE INST. (Oct. 12, 2022), <https://www.sightline.org/2022/10/12/big-reforms-big-growth-buffalos-parking-rewrite-pays-off/>.

Minneapolis, Minnesota: Housing Affordability Impact

Minneapolis eliminated parking minimums citywide in 2021 as part of its comprehensive Minneapolis 2040 plan.⁹ The city provides striking evidence of parking reform's impact on housing costs:

- Rents declined 4% from 2019-2024, during a period when national average rents increased 22%¹⁰
- Substantial cost avoidance by eliminating the requirement for below-grade parking spaces, which can add up to \$50,000 per unit to construction costs¹¹

Seattle, Washington: Quantified Cost Savings

Seattle's elimination of parking minimums generated:

- Over \$530 million in construction cost savings that would otherwise have been incorporated into housing prices¹²
- Enabled production of more than 35,000 housing units¹³
- Legalized over half of all new homes built post-reform¹⁴

Hartford, Connecticut

Hartford, a medium-sized legacy city, eliminated minimums for new developments in 2017 specifically to stimulate downtown revitalization and reduce construction costs, demonstrating early adoption in markets similar to Baltimore.¹⁵

Austin, Texas

Austin became the largest U.S. city to eliminate parking minimums citywide in 2024, doing so primarily to address a severe housing affordability crisis and boost housing supply.¹⁶

⁹ Minneapolis Land Use Reforms Offer a Blueprint for Housing Affordability, MINN. LEGIS. REFERENCE LIBR. (Mar. 7, 2024), https://www.lrl.mn.gov/archive/minutes/senate/2024/housing/20240307/housing_20240307_SF3964-Materials-Pew.pdf.

¹⁰ Eliminating Parking Mandates to Tackle the Housing Crisis, NAIOP (Fall 2025), <https://www.naiop.org/research-and-publications/magazine/2025/fall-2025/development-ownership/eliminating-parking-mandates-to-tackle-the-housing-crisis/>.

¹¹ Minneapolis Land Use Reforms, *supra* note 9.

¹² Emily Hamilton, Reducing Parking Mandates Can Unlock Housing Affordability in Connecticut, MERCATUS CTR. (Feb. 2023), <https://www.mercatus.org/research/state-testimonies/reducing-parking-mandates-can-unlock-housing-affordability-connecticut>.

¹³ *Id.*

¹⁴ Parking Reform Legalized Most of the New Homes, *supra* note 4.

¹⁵ Reducing Parking Mandates, *supra* note 12.

¹⁶ In These US Cities, Parking Reform is Gaining Momentum, INST. FOR TRANSP. & DEV. POL'Y (Feb. 1, 2024), <https://itdp.org/2024/02/01/in-these-us-cities-parking-reform-is-gaining-momentum/>.

Portland, Oregon

Portland has been a long-standing innovator in parking reform, eliminating minimums citywide by 2020 as part of its land use efficiency and sustainability strategy.¹⁷

SUMMARY OF POSITION

The BMZA supports City Council Bill 25-0065 and offers the following observations based on our regulatory experience:

Alignment with Variance Practice:

The elimination of parking minimums reflects the reality that the BMZA has regularly found that applicants seeking an off-street parking variance have met the burden of prove for relief from the rigid parking formulas. This bill would allow development to proceed without requiring case-by-case relief for what has become a routine issue. Buffalo's experience, where parking reform legalized more than half of new homes built, demonstrates the scale of development activity currently constrained by arbitrary parking requirements.¹⁸

Reduced Administrative Burden:

Eliminating parking minimums will substantially reduce the volume of variance applications to the BMZA, allowing the Board to focus its limited resources on more substantive land use questions. This streamlines the development process and reduces costs and delays for applicants, particularly small business owners and developers working on infill projects or building renovations. In Buffalo, the ability to proceed without parking variances accelerated project timelines and removed a significant source of regulatory friction.¹⁹

Removal of Cost Barriers to Development:

Through variance testimony, the BMZA has repeatedly heard that parking construction costs can make otherwise viable projects financially infeasible. The evidence from peer cities quantifies this burden:

- **Construction costs:** Below-grade parking spaces can add up to \$50,000 per unit to apartment construction costs²⁰
- **Total cost impact:** Parking requirements are estimated to inflate basic housing costs by 10-20%²¹

¹⁷ Zoning Requirements for Parking, Loading, and Transportation and Parking Demand Management, PORTLAND.GOV, <https://www.portland.gov/ppd/zoning-land-use/zoning-code-overview/parking-requirements>.

¹⁸ Parking Reform Legalized Most of the New Homes, *supra* note 4.

¹⁹ Big Reforms, Big Growth, *supra* note 8.

²⁰ Reducing Parking Mandates, *supra* note 12.

²¹ Todd Litman, Parking Requirement Impacts on Housing Affordability, VICTORIA TRANSP. POL'Y INST. (Oct. 16, 2023), <https://www.vtpi.org/park-hou.pdf>.

- **Scale of savings:** Seattle avoided over \$530 million in construction costs by eliminating minimums²²

These costs are particularly prohibitive for:

- Small business development in existing commercial buildings
- Adaptive reuse of vacant properties (a critical need in Baltimore’s older urban fabric)
- Affordable housing projects where every dollar affects feasibility
- Projects on small or irregularly shaped lots where parking construction is disproportionately expensive

As noted by the Mayor’s Office of Small & Minority Business Advocacy & Development, parking minimums adds costs to development projects that often cause the projects never to come to fruition. Eliminating this barrier will encourage the renovation and development of unused spaces throughout the City.

Support for Equitable Development and Housing Access

As noted in the Planning Commission’s report, this legislation will remove barriers to the development of both market-rate and affordable housing, increasing opportunities for housing to be created through new construction or the reuse of existing buildings.

The equity dimension is critical: According to the U.S. Census Bureau’s American Community Survey, approximately 27% of Baltimore households had no vehicle available in 2023. Under current regulations, housing for these residents may still be required to provide off-street parking for vehicles they do not own. This requirement creates inequities for car-free households, who may end up bearing the collective cost of providing parking without receiving any benefit.

When parking costs are “bundled” into rent or purchase prices, car-free households (often low-income residents) are forced to subsidize vehicle storage they don’t use.²³ The mandatory inclusion of parking in housing costs represents a regressive policy that disproportionately burdens those least able to afford it and least likely to benefit from it.

Buffalo’s experience shows that eliminating minimums facilitates parking unbundling: the practice of charging separately for parking spaces. One-third of post-reform developments in Buffalo began charging user fees for parking, ensuring that construction cost savings are equitably passed to car-free residents while pricing parking for those who use it. This promotes both affordability and efficient vehicle ownership decisions.²⁴

By eliminating the mandate to provide parking, this legislation allows developers to respond to actual market demand and enables car-free households to access housing without paying

²² Reducing Parking Mandates, *supra* note 12.

²³ Parking Requirement Impacts on Housing Affordability, *supra* note 21.

²⁴ Parking Reform Could Re-Energize Downtowns, *supra* note 6.

for amenities they neither need nor use. This is particularly important in Baltimore, where more than one in four households would directly benefit from this policy change.

Unlocking Development Feasibility

Research comparing pre- and post-reform development in Buffalo and Seattle found a striking result: parking reform effectively legalized more than half of all new homes built in both cities post-reform.²⁵ This demonstrates the monumental scale of housing supply that was previously constrained purely by arbitrary parking ratios in the zoning code.

In Buffalo's first two years post-reform, developers built 502 fewer parking spaces across 36 major projects than would have been required: a 21% decline demonstrating that previous mandates significantly exceeded actual market demand.²⁶

Eliminating minimums allows parking supply to respond to actual demand, which varies considerably by location, transit access, housing type, and demographic factors. The BMZA has observed through variance testimony that parking demand can be significantly lower than code requirements, particularly in:

- Transit-accessible areas with robust public transportation options
- Neighborhoods with high walkability and bikeable infrastructure
- Affordable housing developments where residents have lower vehicle ownership rates (approximately 27% of Baltimore households have no vehicle available per the U.S. Census Bureau's American Community Survey)

Transportation and Environmental Benefits

Research establishes clear empirical relationships between parking requirements and vehicle dependence:

- A 10% increase in minimum parking requirements is associated with a 5% increase in vehicles per square mile²⁷
- Buildings constructed without minimum parking mandates exhibit less than half the car ownership rate compared to those with at least one on-site space per unit²⁸
- Modeling in Colorado projects that removing parking minimums would lead to 71% more homes in transit-oriented areas²⁹

By removing the mandatory subsidization of vehicle storage, parking reform alters the incentive structure, promoting public transit, cycling, and walking use, which subsequently reduces Vehicle Miles Traveled (VMT), traffic congestion, and greenhouse gas emissions.

²⁵ Parking Reform Legalized Most of the New Homes, *supra* note 4.

²⁶ Minus Minimums, *supra* note 5.

²⁷ Parking Requirement Impacts on Housing Affordability, *supra* note 21.

²⁸ *Id.*

²⁹ U.S. DEPT OF TRANSP., PARKING REFORMS (Jan. 2025), <https://www.transportation.gov/sites/dot.gov/files/2025-01/Parking%20Reforms.pdf>.

Flexibility for Market Conditions

Eliminating minimums allows parking supply to respond to actual demand, which varies considerably by location, transit access, housing type, and demographic factors. The BMZA has observed through variance testimony that parking demand can be significantly lower than code requirements, particularly in:

- Transit-accessible areas with robust public transportation options
- Neighborhoods with high walkability and bikeable infrastructure
- Affordable housing developments where residents have lower vehicle ownership rates
- Small commercial uses serving neighborhood populations

Buffalo's data confirms this observation: developers voluntarily chose to provide 21% less parking than previously mandated, indicating that market demand is substantially lower than the code required.³⁰

Baltimore's Context as a Legacy Industrial City

Buffalo's successful application of parking reform in a legacy industrial context provides compelling evidence for Baltimore. Buffalo used its zoning reform not merely to control development, but strategically to attract investment and reverse population decline. The ability to eliminate parking mandates made projects involving the adaptive reuse of historic structures and dense infill development economically feasible—projects that would have been prohibited under their old zoning code.³¹

For Baltimore, which similarly seeks to reverse population decline and promote strategic growth, the policy offers a proven mechanism to unlock the potential of existing urban land and historic infrastructure. By reducing cost barriers and regulatory hurdles associated with parking, the City can stimulate the kind of development needed to attract residents and jobs, following Buffalo's successful trajectory as a revitalization catalyst.³²

CONSIDERATIONS AND MITIGATION STRATEGIES

The BMZA acknowledges potential concerns about on-street parking impacts in some neighborhoods. As noted in the Planning Commission's report, the removal of required off-street parking may lead to increased demand for on-street parking, which is already limited in some areas of the City. However, experience from peer cities demonstrates these concerns can be effectively addressed through:

³⁰ Minus Minimums, *supra* note 5.

³¹ Parking Reform Could Re-Energize Downtowns, *supra* note 2.

³² Big Reforms, Big Growth, *supra* note 8.

1. Management Tools

- Residential Permit Parking (RPP) programs, as noted by the Parking Authority of Baltimore City
- Site plan review processes that can consider neighborhood context
- Market forces that will encourage developers to provide parking where demand exists

2. Transportation Demand Management (TDM)

Cities like Minneapolis and Buffalo have successfully mitigated spillover concerns by requiring large developments to submit comprehensive TDM plans, which mandate elements like subsidized transit passes, shared mobility programs, and high-quality bicycle infrastructure. This shifts the regulatory focus from simply demanding mandatory storage to actively managing and reducing vehicle travel demand.³³

3. Parking Unbundling

As demonstrated in Buffalo, where one-third of post-reform developments began charging separately for parking, unbundling ensures that:

- Car-free households aren't forced to pay for parking they don't use
- Parking users pay directly for the spaces they occupy
- Market signals accurately reflect actual parking demand
- Cost savings from reduced parking construction benefit those who need affordable housing most³⁴

The BMZA also notes that developers retain the ability, and often the financial incentive, to provide off-street parking as market conditions warrant. The bill simply removes the mandate, not the option. In many cases, projects will continue to include parking, but the amount will be determined by actual need rather than arbitrary formulas. Buffalo's experience shows that even without minimums, developers still built substantial parking—just 21% less than the previous mandate required, indicating the reform eliminates waste rather than eliminating necessary parking.³⁵

³³ As More Cities Eliminate Parking Minimums, What Happens Next?, NAIOP (Summer 2023), <https://www.naiop.org/research-and-publications/magazine/2023/Summer-2023/development-ownership/as-more-cities-eliminate-parking-minimums-what-happens-next/>.

³⁴ Parking Reform Could Re-Energize Downtowns, *supra* note 6.

³⁵ Minus Minimums, *supra* note 5.

FISCAL IMPACT TO BMZA

The legislation is expected to reduce variance application volume to the BMZA, resulting in modest administrative savings through reduced hearing time and staff processing. There is no anticipated negative fiscal impact to the Board's operations.

Given that parking requirement variances represent one of the most common categories of requests the Board receives, the reduction in this application type will allow staff and Board members to dedicate more time and attention to substantive land use and zoning matters that require careful discretionary review.

RECOMMENDATION

Based on the Board's extensive experience with parking variance requests, the compelling evidence from peer cities demonstrating quantifiable benefits, and the alignment of this legislation with the City's comprehensive planning goals, the Board of Municipal and Zoning Appeals staff respectfully recommends a **FAVORABLE** report on City Council Bill 25-0065.

The elimination of off-street parking minimums represents sound, evidence-based zoning policy that balances development flexibility with community interests. The peer city experience demonstrates this reform will provide:

Economic and Development Benefits

- Reduce construction costs by eliminating mandatory expenses of up to \$50,000 per below-grade parking space
- Unlock previously infeasible projects, particularly adaptive reuse and infill development critical to Baltimore's revitalization
- Increase housing supply by legalizing projects currently prohibited by parking requirements
- Support housing affordability by reducing development costs and enabling parking unbundling
- Streamline the development process by eliminating the need for routine parking variances

Equity and Social Benefits

- Eliminate forced subsidies where car-free households (27% of Baltimore residents) pay for parking they don't use
- Remove barriers to both market-rate and affordable housing development
- Enable more efficient use of existing buildings through adaptive reuse and conversion projects

Environmental and Transportation Benefits

- **Reduce vehicle dependence** and associated greenhouse gas emissions
- **Promote transit-oriented development** and walkable urban environments
- **Advance Complete Streets** and sustainability goals outlined in the Comprehensive Master Plan

Administrative Benefits

- Reduce variance application volume to the BMZA
- Allow focus on substantive land use questions requiring discretionary review
- Maintain appropriate regulatory oversight through preserved parking maximums

This legislation is particularly consequential for Baltimore as a legacy industrial city seeking revitalization. The city of Buffalo, which has successfully used parking reform to reverse decline and attract investment, provides a proven model for how this policy can catalyze economic development, housing production, and neighborhood revitalization in cities facing similar challenges to Baltimore.

The evidence is clear and quantifiable: eliminating minimum parking requirements is an essential, proven, and highly effective policy intervention for fostering sustainable urban growth. This reform represents an important step toward modernizing Baltimore's zoning regulations to encourage growth, support equitable development, and position the City for long-term economic vitality.

For any questions regarding this report or to discuss these concerns further, please contact **Justin Williams** at justin.williams@baltimorecity.gov or **(410) 396-4301**.