July 13 2010

Amanda M. Burden
New York City Planning Commission
22 Reade Street
New York, NY 10007

Re: Proposed Car Share Zoning Text Amendment

Dear Chair Burden:

The Zoning Committee of the Citizens Housing & Planning Council (CHPC) has reviewed the proposed text submitted by the Department of City Planning (DCP) for an amendment of the Zoning Resolution of the City of New York to allow car sharing in New York City. We applaud the forward-thinking vision of DCP to integrate car sharing into the city’s parking infrastructure.

It is critical that the Zoning Resolution supports and encourages technological innovation and lifestyle shifts that contribute towards the goals laid out in Mayor Bloomberg’s PlaNYC, to make New York a model for cities in the 21st century. Studies show that easily accessible car sharing programs can lead to a reduction of car ownership and usage, therefore cutting greenhouse emissions and air pollution. Car sharing also has the potential to reduce the strain on parking infrastructure which, given time, could result in less parking needed for new developments. This could reduce the cost burden on the construction of new housing, making it easier and cheaper to build.

In addition to our full support of this text amendment, CHPC would also encourage an extension of these principles once the initial impact of this change can be assessed. We believe that the amendment should be reviewed in five years to keep up with changes in demand and in the structure of car sharing services themselves. We would then ask DCP to consider the following actions in order to ensure that car sharing services continue to be encouraged:
1.) Allow car share services to provide staff at off-street parking locations. This will allow car share organizations to provide expanded services (for example, a valet service) if they choose to.

2.) Increase the percentages of parking spots that can be reserved for car share vehicles across the board, thereby allowing market forces to better determine the amount of parking spots available to car share organizations.

3.) Expand the program to include low-density one and two family residential districts. With the exception of accessory parking at colleges or universities in these districts, car sharing vehicles are generally not allowed in these districts. Because there are a high percentage of car owners in these districts, the ability for car share organizations to reduce the number of cars on the road is hindered if these organizations are not allowed to do business in these districts. The availability of car share services for weekend errands or leisure activities may encourage car pooling or reduce the need for households to own more than one car. Tech-savvy car share services may also come up with innovative ways to serve these areas, only to be barred from working there.

Once again, CHPC would like to reiterate our support of the car share zoning text amendment which will contribute towards the city’s effort to create a greener New York. We also look forward to the upcoming DCP studies on parking that are being released later this year.

Sincerely,

Jerilyn Perine