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HISTORIC TAX CREDIT TOOL BOX &

How to Make Parking Requirements Work with HTC Projects

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hile America's love of the open road is legendary, it's the utilitarian need to park our cars which has a greater impact when it comes to our buildings. While none of us were around, I'm sure one of the first questions after the awe of seeing Henry Ford's Model T roll down Main Street was "where do I park this thing?"

City Planning and Development Patterns

Our communities have always been designed based on our mode of transportation. Feet, horses, carts; that's pretty much what we had throughout our history. Inventions during the industrial revolution improved transportation, with trolleys having the greatest effect on local transportation. Until the turn of the 20th century, the design of American towns and cities was predicated on human and horse power, with late 19th century planners adopting trolley's and trains as means of conveyance. Visit Old City in Philadelphia and Downtown Crossing in Boston and you'll understand how early American cities were planned; plenty of room to hitch up your horse, not so much room to park your '57 Chevy.

The design of cities continued relatively unchanged through the first decades of the 20th century when

"horseless carriages" were seen more as a novelty than a practical means of conveyance. Sure, some residential neighborhoods were built less densely, but these were no different from the neighborhoods built in the previous decades that included carriage houses at the rear of the property. In general, cities continued to have narrow streets with lots fully built upon. It wasn't until the 1910s and 1920s that cities began to adapt to the automobile. It was during this first golden era of the automobile that the country's first parking garages were constructed. These early garages were built to blend with the urban character of cities, often designed to match adjacent buildings and generally featuring an ornamented exterior. These garages, generally constructed by private entities, were not just car warehouses, but representative of the luxury of car ownership and often included car dealerships, repair services and fueling stations. One such example, the R.E. Hines Motor Company garage in Jackson, Miss., was built in 1926 and later rehabilitated by HRI Properties for use as customer parking for the adjacent King Edward Hotel project.

As our culture became more autocentric in the midcentury period, cities were adapted to meet

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parking needs. Once the domain of streetcars, cities became dominated by cars and parking demands skyrocketed. In cities throughout the country, municipal parking entities were formed to meet this demand. Cities added metered street parking, but the huge number of cars required off-street parking to meet demand. Both the municipal entities and private entities began to reshape cities by demolishing buildings and constructing parking garages. Unlike the early private parking garages, midcentury facilities were generally spartan in design, no longer a testament to the privilege of car ownership, but a utilitarian response to

the need for ever growing amounts of parking. In cities where real estate values were low, significant numbers of buildings were demolished and replaced with surface parking. Updated midcentury city zoning ordinances further solidified the dominance of the automobile with the implementation of minimum parking requirements.

Even with the revised zoning and proliferation of urban parking garages and surface lots, cities in the midcentury could no longer keep up with America's love affair with the automobile. During this period, central cities began a five-decade decline, owing much in part to the country's postwar development patterns and growth of automobile ownership. In response to these changes, developers began building factories and offices in the suburbs, in complexes surrounded by parking and easily accessible from the newly constructed highways which defined the growth and prosperity of midcentury America.

Return to the City

Following decades of decline in most American cities, the new millennium saw a change in fortune for cities throughout the country. After decades of disinvestment and demolition, the new century became witness to a new era of investment within America's urban centers.



Image: Courtesy of Heritage Consulting Group

On the exterior of the 220 Water Street project in Brooklyn, a former loading bay was converted to the vehicular entrance to the parking area.

Changing attitudes and public policy made cities a place to invest again, a place where both young and old came to live, work and play. While certainly not replacing the convenience of the suburbs, the viability of cities began to return, a pattern that continues.

Although the return-to-the-city movement stemmed the tide of disinvestment in many locations, the fundamental issue remains where do I park? This question is particularly topical for developers rehabilitating historic buildings. The good news is that many midcentury buildings are now considered historic, including a growing number of suburban office complexes. For these properties, parking is generally not an issue, as many of them were built in the days of Detroit's monster V8 autos and have generous exterior parking or interior parking which was built as part of the original project. Buildings built before the midcentury period are not so fortunate.

Parking Solutions for Historic Rehabilitations

As with politics, all real estate is local. In certain markets, parking is not an issue and codes have been revised to minimize the number of parking spaces attached to a development. That being said, the reality is that building users need a place to park and this is

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no exception for historic rehabilitation projects. When rehabilitating a historic building, there are options for obtaining the necessary amount of parking for your building. In heavily developed central business districts such as Manhattan and The Loop, developers can enter into agreements with existing parking operators and use valet service, thus eliminating the need to have on-site parking. In locations of lesser density, or where numerous surface lots remain, developers may find the most reasonable action is to provide parking on those lots or to build new parking structures to service their tenants and customers.

Should on-site parking be imperative, design solutions may prove feasible to include parking within a historic tax credit (HTC) rehabilitation project. Again, parking solutions are on a building-by-building basis. The buildings most readily adaptable to interior parking are former industrial buildings. Buildings such as warehouses and factories were often constructed to withstand heavy loads and have large open spaces conducive to parking. Parking within the basement and lower floors of these types of buildings is similar in character to the building's historic use and is generally accepted by the National Park Service (NPS). Since these buildings are already industrial in character, changes for parking use are generally limited.

Adding interior parking to nonindustrial buildings can be a challenge to get approved as part of an HTC project. In general, the NPS is not keen on the transformation of formerly finished space into parking space. In their denial of this treatment, the NPS may reference the Secretary of the Interior's Standards for Rehabilitation Standard 1, which indicates that, "A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships." Depending on the changes proposed, it is possible that the NPS could consider interior parking to be an incompatible

use for a historic building. In order to minimize this possibility, a design team must minimize the changes to the building as much as possible to maintain its historic appearance and feeling. Most importantly, no changes to a significant space can occur, so parking may only be inserted into typical interior space and should not impact any character-defining spaces. Further, interior spaces used for parking should retain their historic feeling; formerly finished spaces cannot be turned into a typical parking garage, but should have finishes that are similar to the building's historic use to the greatest extent possible. The NPS could require floor, wall and ceiling finishes that more closely resemble the historic building than a developer would prefer. This may not be ideal and can add to the project budget, but creative design and use of materials can solve this design issue, especially when the need for interior parking is critical to the project.

Additionally, it is critical that the addition of interior parking does not alter the appearance of the building's exterior, especially the primary elevations. The less visible, the greater the chance of approval. Parking in the basement is ideal as this space is generally utilitarian in character and not visible from the exterior. Nothing says parking more than headlights shining through the windows of a former office floor. It is important that quality design schemes are used to conceal the interior parking, ensuring that the building retains its historic exterior appearance. Vehicular entrances should be located at existing openings if possible, existing loading docks or freight doors are ideal. Should new vehicle entrances be required, they should be located on secondary elevations and should not impact any character-defining features. The key to approval for interior parking is to limit exterior visibility and minimize interior alterations so that the historic character of the building is preserved to the greatest extent possible.



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Example: 220 Water Street Project

The 220 Water Street project, completed by GDC Properties, rehabilitated a vacant four-story warehouse in the DUMBO district of Brooklyn for use as residential apartments. As the DUMBO district has little parking available, the basement of the building was rehabilitated for use as tenant parking. On the exterior, a former loading bay was converted to the vehicular entrance to the parking area. Within the basement parking area, a number of windows were left unglazed and protected with screen to provide necessary ventilation and structural columns and ceilings were left exposed.

As long as people continue to drive cars, parking will be an issue. When rehabilitating a historic building, it is important to consider parking requirements early in the project. While there are options to meet your parking needs, there is no guarantee that parking will come as easily as it did during the midcentury period. Valet, off-site and parking within existing parking structures may provide the easiest path forward. Where on-site parking is necessary, it is important to understand the limitations of the building. Industrial and warehouse buildings are more suitable to include interior parking due to their historic use and appearance. Historically finished buildings including hotels, office buildings and apartment buildings are a greater challenge due to their historic use and finished interior appearance. Installation of parking within historic buildings is difficult, but may be approved in the right situation, with the right design. \$\frac{1}{2}\$

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