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To: Members of the Kansas City, Missouri City Council
c/o City Clerk's Office

Re: Opposition to Proposed Amendment Repealing Section 88-420 "Parking and Loading"
in Chapter 88 – Zoning and Development Code

Dear Council Members:

I respectfully submit this testimony in opposition to the current zoning code amendment that would repeal Section 88-420 of the Kansas City Zoning and Development Code and remove minimum off-street parking requirements citywide, including areas designated by the city as "urban core" that extend far south of 85th Street. I urge a more nuanced, data-driven approach instead of a blanket repeal.

The "Urban Core" Boundary Proposed by the City is Overly Broad

The city's approach to defining its "urban core" extends well beyond areas most residents would reasonably consider true urban form or served by high levels of transit or walkability. This expansive geographic scope would apply the same liberalized parking policy across both dense urban neighborhoods and lower-density residential neighborhoods where automobile use remains the practical norm. Transit options in many of these areas are limited, and street environments are not suited to unmanaged on-street parking.

Purpose of Current Parking Standards in Kansas City

Kansas City's current Section 88-420 requires minimum off-street parking ratios based on land use, residential units, commercial floor area, and occupancy intent, precisely to help avoid spillover parking on adjacent streets and ensure adequate access and safety for residents, customers, and service vehicles. The code itself states the intent is to "ensure provision of off-street parking and loading facilities in rough proportion to the generalized

parking and loading demands of different land uses” and to “help avoid the negative impacts associated with spillover parking into adjacent neighborhoods.”

Evidence from Urban Planning Research

Parking spillover and street congestion are real risks without off-street parking. When new residential or mixed-use buildings are developed without sufficient off-street parking, research going back decades emphasizes that parked vehicles will tend to seek available spaces on adjacent streets, creating spillover congestion that burdens existing single-family residential neighborhoods and can degrade quality of life unless managed with permit programs or curb pricing.

While some contemporary parking reform advocates point to cities eliminating parking minimums to reduce housing costs or support transit-oriented growth, those reforms generally are accompanied by robust transit systems, parking permit districts, demand-responsive curb pricing, or other context-sensitive measures that direct where and how reduced parking might function. Simply eliminating requirements without complementary policies does not ensure residents and visitors can find off-street parking where needed. Even now the cost of public transit is set to increase in conjunction with a decrease in service routes.

Market-only decisions do not guarantee appropriate provisions.

Some analyses show that in cities that removed minimums, developers often still provide parking if the market demands it. In Buffalo, for example, even after parking mandates were removed, developers voluntarily included parking in a majority of new projects, averaging significantly fewer spaces than the former minimums but still meeting some demand. Without thoughtful guidance, this could lead to unpredictable outcomes, including too few spaces in locations not well served by transit.

Local Context: Kansas City’s Infrastructure and Transit Patterns

Unlike some coastal or dense peer cities with high transit ridership and well connected non-automobile infrastructure, large portions of Kansas City retain car dependent travel patterns and limited transit capacity. Removing minimum off-street parking requirements in those areas will exacerbate existing parking pressures on neighborhood streets unless accompanied by clear alternative transportation investments and residential parking management programs.

Why Parking Minimums Are Still Relevant for Kansas City

In the context of Kansas City, there are several concrete reasons to maintain some form of off-street parking minimums:

1. **Protect Neighborhood Character and Livability.**
Without minimums, multi-unit residential and mixed-use developments in single-family neighborhoods may shift parking demand onto local streets, increasing congestion and reducing sidewalk safety.
2. **Safety and Emergency Access.**
Street parking overflow can impede emergency vehicle access and pedestrian visibility — critical issues in lower-density residential areas.
3. **Service and Delivery Needs.**
Businesses and residential uses still require space for loading, deliveries, and resident parking. Minimums ensure these uses do not spill indiscriminately onto public sidewalks and rights-of-way.
4. **Lack of Equitable Parking Management.**
Minimums provide a predictable baseline so that residents are not forced into ad-hoc curb parking without effective permit systems, pricing mechanisms, or enforcement strategies.

Meaningful Policy Alternatives to Blanket Repeal

Rather than eliminating parking minimums entirely, there are several balanced, research supported alternatives that can achieve many of the city's goals while addressing resident concerns:

Contextual Parking Standards: Establish tiered parking requirements based on the character of the area:

- Lower minimums near high-capacity transit and dense urban centers,
- Moderate minimums in transitional areas,
- Standard minimums in lower-density residential neighborhoods outside of robust transit zones.

Parking Maximums + Shared Parking Strategies:

Instead of removing all requirements, consider parking maximums near core areas to prevent excessive surface parking and promote shared parking agreements between uses (offices, retail, housing) with different peak demand times.

Optional Parking Compliance Tools

Allow developers to submit parking demand studies, transportation demand management (TDM) plans, or shared-parking plans that would justify alternative parking provisions based on actual projected use rather than broad exemptions.

Residential Parking Permit Districts

Complement any change with robust permit parking programs to protect existing residents from spillover and allow controlled on-street parking where off-street provision is insufficient.

Conclusion

A blanket repeal of Section 88-420; eliminating minimum parking requirements citywide is not an appropriate, equitable, or thoughtful policy for Kansas City, especially given the broad extent of the city's designated "urban core." Research consistently shows that parking requirements play a role in preventing spillover congestion, protecting neighborhood livability, and guiding predictable development patterns. This is particularly true where alternative transportation infrastructure is not yet sufficient. A tiered, data driven, and thoughtfully informed approach that balances growth, transit goals, and neighborhood needs is needed instead of an unconditioned repeal. The current proposal is the lazy approach and shows that the council is unwilling or unable to spend time crafting an relevant solution. I hope that they prove able to address issues effectively without resorting to metaphorical sledge-hammers because anything more would take work.

Thank you for your time and consideration.

Respectfully submitted,
Brian Boman

REFERENCES

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