

TESTIMONY OF ELLEN M. McCARTHY

APPLICATION FOR AN AREA VARIANCE FROM THE PARKING REQUIREMENTS OF SECTION 2101.1 OF
THE ZONING REGULATIONS TO ALLOW THE CONSTRUCTION OF A NEW NEIGHBORHOOD LIBRARY

AT

1801 HAMLIN ST N.E., LOT 825 IN SQUARE 4210 (THE "PROPERTY").

Good morning, Mr. Chairman and members of the Board of Zoning Adjustment. My name is Ellen McCarthy, and I am testifying as an expert witness in zoning and land use, regarding how the application for an area variance from the parking requirements for the proposed new neighborhood library meets the requirements of the Zoning Regulations. As such, the testimony succinctly addresses the three criteria which must be met by the applicant to satisfy the standards established in §3101.3 of the Regulations.

HOW THE APPLICATION MEETS THE ZONING REGULATION STANDARDS FOR AN AREA VARIANCE

1. The property is unique

- a. As the Office of Planning report points out, compared to other recently-modernized neighborhood libraries, the current lot size, slightly over 20,000 sf, is small.

i. Anacostia 46,695 sf

ii. Benning Road 25,065 sf

iii. Lockridge/Bellvue Library 29,793 sf

- b. The site soils are of poor structural quality which limits the excavation of the basement due to the cost to provide more than the space required for necessary equipment and utility spaces.

2. DC Public Library would encounter serious practical difficulties if strict adherence to the Zoning Regulations were required

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- a. §2101.1 of the Regulations would require 20 spaces; only 11 are possible to provide, at grade at the rear of the building.
- b. There is no practical option to increase the amount of parking on the property
 - i. The lot can not be expanded, as it is bounded by public streets on the north and west, a privately-owned, single-family home on the east and a public alley and National Park Service land on the south
 - ii. The Library can't expand the surface parking on the site.
 - 1. The zoning requirements state that parking spaces must be a minimum of 19 feet long, with a 20 foot wide drive aisle – therefore to add a second row of parking behind the existing row would require a total depth of 58 feet, slightly less than half of the footprint, which is only 124 feet deep from north to south. Given the ground floor requirements for library operations (see section 2.iii.2 below), this is not possible.
 - iii. The Library can't put the parking underground without exorbitant cost because of the constrained size and shape of the lot, ground floor requirements of the library program, and geotechnical conditions.
 - 1. LEED requirements and DC Water stormwater regulations create a need to include a green roof and bio-retention ponds. Therefore equipment that would normally be on the roof must be located in the basement and on the limited remaining site area.
 - 2. Operational requirements for the Library necessitate that a large number of functions must take place on the ground level, including the main entrance and secondary entrance, book drop, check-out counter, staff work rooms and offices, adult media area, the entire children's area, a community meeting room large enough to hold 100 people accessible during the hours that the library is not open (and therefore requiring a direct entrance/exit at the ground level), rest rooms and circulation space.
 - 3. Putting in underground parking would require an exorbitant cost for which additional funds are not available. The present budget provides only for the pre-set DCPL program requirements.
 - a. In addition to the increased cost for excavation, the poor soil conditions (as described in section 1.b above) would

require the installation of piles and pile caps, which would be required to excavate another level underground, and be prohibitively expensive. The dimensions required for parking spaces in the Regulations, coupled with the small size of the building footprint, the space required for the necessary equipment for the HVAC and other systems that must be located in the basement, along with the space that would be required for a ramp to get autos to the underground space and other auto circulation space, would make it highly likely that the required parking would require excavation of a second underground level, which would be exponentially expensive.

3. There will be no substantial detriment to the public good or impairment of the intent, purpose or integrity of the zone plan

a. No substantial detriment to the public good

- i. A public library is an important public service; the Comprehensive Plan recognizes the need to modernize current facilities:

As one of the world's leading centers of information and knowledge, the District of Columbia must have a state-of-the-art public library system. A revitalized library system must combine high quality physical buildings with new technology, an expanded Internet presence, inviting public spaces for meetings and gatherings, and programs and collections that meet the needs of all citizens. Our libraries should help children succeed in school, help adults improve their reading skills, and support career advancement and life enrichment goals. The District should aspire to nothing less than greatness as it creates a library system that demonstrates the city's commitment to meeting the educational and life-long learning needs of all of its residents. 10 DCMR § 1109.1.

- ii. A public library is a local-serving use – and most patrons are expected to access it on foot. This is particularly true for the Woodridge site, as the traffic consultants' report points out that there are seven other libraries located within a three mile radius. In addition, the Statement of Reasons indicated that there are seven schools in relative proximity to the site.
- iii. The amount of parking provided on-site remains the same, with minimal increase in size of library (slightly more than 2,000 sf).

1. The Woodridge Library has existed on this site, with the same amount of parking, for more than 50 years, with no apparent adverse effects.
- iv. Substantial supply of convenient on-street parking
1. The Wells and Associates traffic report counts 247 on-street parking spaces located within a 1 – 2 block radius of the library before 6:30 in the evening and 277 spaces after 6:30 and on weekends.
 2. The traffic report finds that, even during peak periods of library use, 60% or more of the on-street parking spaces are available. In his landmark study of off-street parking, The High Cost of Free Parking, UCLA professor Donald Shoup confirms Wells' conclusion that a maximum utilization of 80-85% is sufficient to avoid potential parkers having to circle looking for available spaces. The current level of utilization is far below that.
- v. There are ample automobile alternatives available to provide access to the library
1. Site is served by 7 bus routes
 2. A bike-share station is located within a block
 3. There are two Zipcar spaces located within a short distance
- vi. Adjacent uses have ample amounts of off-street parking or are very low-density uses generating minimal demand for parking
1. Parking demand in the area is reduced by the fact that most of the commercial establishments along Rhode Island Avenue have their own parking lots, visible in the aerial photo; the peak hours of parking demand by the library generally do not coincide with operating hours of these establishments.



2. In addition, of the eleven (11) single family homes located on Hamlin east of the Library site, it appears that four (4) have their own off-street parking spaces with curb cuts on Hamlin, and others may have access to parking in the rear, off of the alley. Many other homes in the surrounding neighborhood also have parking for vehicles on site
3. Overall parking demand is further reduced by the presence of large amounts of open space both abutting the Library and across 20th Street. Langdon Park, in its entirety, comprises approximately 8.25 acres, and it is across 20th Street from additional parkland of more than 11 acres, which includes the Langdon Recreation Center.



b. No harm to the intent, purpose or integrity of the zone plan

- i. The site is located within C-2-A zone, a medium density commercial zone where libraries are a matter of right. It is clearly consistent with the purposes of the C-2-A zone, as described in the Regulations:
 1. 720.2 The C-2-A District is designed to provide facilities for shopping and business needs, housing, and mixed uses for large segments of the District of Columbia outside of the central core.
 2. 720.3 The C-2-A Districts shall be located in low and medium density residential areas with access to main highways or rapid transit stops, and shall include office employment centers, shopping centers, and medium-bulk mixed use centers.
 3. 720.4 The C-2-A District shall permit development to medium proportions.
- ii. The site is identified in the Comprehensive Plan Generalized Policy Map as a “Main Street Mixed-Use Corridor”, which calls for encouraging transit and pedestrian access, totally consistent with reducing the number of parking spaces.

- iii. In ZC Order 03-10, establishing zoning for public libraries, the Zoning Commission singled out public libraries as worthy of special treatment, given their beneficial qualities:

The Commission feels that treating public libraries differently from other libraries is justified, because public libraries are supported largely by public money and are specifically designed to benefit all residents.

- iv. The zone plan accepts a trade-off between parking requirements and alternative transportation access in §2104.2, which permits the Board to reduce parking for libraries by 50% within a half-mile from a Metro station. DCPL is asking for a reduction of less than 50% parking, and this library is slightly more than 1 mile from two different Metro stations, and served by 7 bus lines, some with average headways of 15 – 24 minutes, as well as numerous alternative access modes. Similarly, §2108.3 permits the Board to reduce on-site parking for libraries by 100%, as a special exception. Therefore, to reduce the on-site parking by 9 spaces at this site does not impair the integrity or intent of the zone plan.

In summary, the site has been used as a public library for more than 50 years, providing the same number of parking spaces as will be there for the proposed library, without any significant problems. The site is unique in being small for the proposed use, compared with other new libraries, and it has unusually unstable soil which makes underground construction difficult, risky and expensive. The soil conditions, the inability to expand the site and the need for the ground floor to accommodate a number of functions which require virtually the entire site, except for the approximately 9 or 10 feet behind the structure where the parking is currently located, would result in a serious practical difficulty if the DC Public Library were required to strictly adhere to §2101.1 of the Zoning Regulations. The existence of ample off-street parking for most of the nearby uses, along with substantial number of on-street spaces which remain available even during the library's peak hours, mean that there will be no significant adverse impacts on the neighboring property. The past willingness of the Zoning Commission to provide for the ability to reduce on-site parking for libraries indicates not only how important they are considered as public services, but also that providing relief from parking requirements does not impair the purpose, intent or integrity of the zone plan.

In my professional opinion, the application meets all the necessary criteria to support the granting of an area variance to reduce the on-site parking by 9 spaces, and will not have an adverse impact on neighboring property or the integrity of the zone plan.