



November 24, 2014

DC Board of Zoning Adjustment  
441 4th Street NW Suite 200S  
Washington, DC 20001, via: [bzasubmissions@dc.gov](mailto:bzasubmissions@dc.gov)

Re: Support for BZA Case Number 18852 & 18853 – 90 & 91 Blagden Alley NW -- Reduced parking

Dear Chairperson Jordan and members of the Board:

Please accept these comments on behalf of the Coalition for Smarter Growth (CSG). The Coalition for Smarter Growth is the leading organization working locally in the Washington, D.C. metropolitan region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We wish to express our support for this 123-unit residential housing project and the variances needed to make it feasible and appropriate to its unique context. Given the continued strong demand to live in this growing neighborhood, the site's walking and bicycling proximity to hundreds of thousands of jobs, and the neighborhood's low car ownership rate, this project is a helpful contribution to meeting the city's need for more housing. The project is an especially welcome addition to our city's in-demand housing stock as it provides 11 Inclusionary Zoning units, half affordable at 50% AMI and half at 80% AMI.

Building this housing project without the zoning code-required vehicle parking is the best approach to enhancing the surrounding neighborhood and reusing this historically significant site. No vehicle parking should be required for this project for the following reasons: (1) parking would be a costly and unneeded expense, especially given the numerous transit alternatives already available in the neighborhood; (2) the project is only intended for residents who do not want or need a car; (3) the project's management will amplify residents' already significant transportation options through a substantial transportation demand management program and other services; and (4) the historic character of Blagden Alley would be significantly degraded by adding parking facilities. We discuss each below.

### **Parking Facilities Would Be a Needless and Costly Expense**

The immediate neighborhood surrounding the project supports car-free living with high levels of walk, bicycle and transit access to nearby shops, services, employment, and longer distance transit. Notably, the largest share of commuters in this Census Tract commutes by walking to their jobs (37%), followed by riding transit (31%).<sup>i</sup> This area also already enjoys a 41% car-free rate among renters. In urban neighborhoods such as this, already well-served by transit and other non-vehicular transportation options, parking minimums are a costly requirement that add to already high housing costs, generate unnecessary traffic, and in this case in particular, generate vehicular traffic that would degrade the historic, pedestrian-oriented alley environment. Further, the rapid innovations in personal travel through on-demand car services, car-sharing, and smart phone-based travel information are making personal vehicle ownership increasingly optional and a costly liability in highly-accessible neighborhoods like

this one. The project offers a sound alternative to unworkable parking requirements and demonstrates the fallacy of the notion that there is a fixed amount of parking demand per housing unit.

### **The Project Will Attract Residents with Little Need for Private Vehicles**

The proposal calls for the development of 123 studio apartments that would, even more so than other development projects around the city, draw residents who are particularly disinclined to bring personal cars with them. These include single professionals, employees, graduate students, consultants, or contractors on work assignments, and others who are attracted by the smaller unit size and the convenience of shared on-site amenities that even further reduce their need to use personal vehicles to get around. This proposal is thus an outstanding opportunity to increase housing options for the many residents who would like to avoid the costs and inconveniences of personal car ownership and benefit from the site's accessibility and rich travel choices.

### **The Project Strengthens Existing Alternatives to Car Ownership**

We agree with ANC 2F that the developer has demonstrated a compelling alternative model for providing housing that does not generate demand for vehicle parking. In addition to taking advantage of existing transportation options, the project will offer an even more attractive car-free lifestyle to residents through a robust transportation demand management (TDM) program. We specifically applaud the developer's commitment to pay for installation of a new Capital Bikeshare station and additional bikes (27 docks & 14 bikes), bikesharing and carsharing memberships, a secure bicycle storage room for 42 bicycles, a bicycle repair room, and annual bike education and training events. This alternative approach to addressing the transportation needs of residents will ensure the housing is a success and attracts car-free residents. In addition, the project's lack of eligibility for Residential Parking Permits (RPP) eliminates the potential impact on demand for public street parking.

### **Additional Parking Facilities Would Only Degrade the Historic Character of Blagden Alley**

The zoning code-required parking spaces are infeasible and harmful given the exceptional conditions of the historic site and the character of historic Blagden Alley. Adding vehicle parking and generating more reasons to drive through Blagden Alley would be detrimental to the historic character of the alley which is now a popular pedestrian-oriented place.

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We urge the BZA to approve this application. New housing opportunities like this project are critically important to achieving our Sustainable DC goal of 75% non-auto trips for the sake of protecting the climate, improving safety and enhancing the livability of our city.

Thank you for your consideration.

Sincerely,



Cheryl Cort, Policy Director

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<sup>i</sup> 37% of commuters walk to work, 31% ride public transit, 24% drive alone, Census Tract 49.02, DP03: Selected Economic Characteristics, 2008-2012 ACS 5 Year Estimates. Additionally, 41% of renters own no cars in this Census Tract.