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OFFICE OF ZONING

December 19, 2010

Via Fax (202-727-6311) and Email (zcsubmissions@dc.gov)

Chairman Anthony Hood and Commissioners,
District of Columbia Zoning Commission
441 4th St NW # 200
Washington, DC 20001

Ref: Proposed Zoning Changes – Minimum Parking Requirements

Dear Chairman Hood and Commissioners,

We write in connection with changes to off-street parking minimums proposed by the Office of Planning with respect to new commercial and residential development. Specifically, we are gravely concerned that reduction of minimums, in areas served by Metrobus as well as Metrorail, will essentially shift the parking burden from private developers to already burdened public streets. As described below, previous studies by both DDOT and OP underscore our concerns and we urge you to reject these changes are currently proposed.

We speak from experience of living in Cleveland Park, in the area between Connecticut Avenue and Wisconsin Avenue, N.W. Although the area near Connecticut Avenue lies in proximity to the Cleveland Park Metro station, the residential side streets intersecting Connecticut Avenue are already jammed from morning to late evening with parked vehicles. On the other side of Cleveland Park, along Wisconsin Avenue which is not served by Metrorail, DDOT's own Wisconsin Corridor study noted in 2006 that the street parking in the area of the Macomb-Woodley commercial area was then at over 90% of capacity. This of course, was even before construction of several large residential and commercial buildings along Wisconsin Avenue, including pursuant to *Friendship Shopping Center PUD, Zoning Commission Case No. 08-15*, where the off-street parking to be provided is less than what current zoning regulations normally require. Further reducing parking minimums will unacceptably burden these streets which, as the DDOT Wisconsin Corridor study documented, already are at capacity for street parking.

We are particularly concerned that the Commission is considering relaxing parking minimums not just in areas near Metrorail stations, but along corridors served only by bus. As you know, bus service along Wisconsin Avenue is too infrequent and unreliable to have the same impact as Metrorail on potential transportation choices. OP itself has recognized that in

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commercial areas that are not close to Metrorail stations, even when served by frequent, multiple bus routes, patrons are more likely to drive to commercial establishments and use vehicles for commuting. As OP concluded in its 2006 commercial district analysis of Glover Park, an area just south of Cleveland Park along Wisconsin Avenue, "[t]he Glover Park Commercial District is served by several bus routes but not a Metrorail station, therefore making driving more likely than in some other communities."¹

Finally, if the Commission considers reducing parking minimums in so-called "transit-oriented" zones, it should follow the lead of Arlington County. Arlington County's regulations provide that *if a developer elects to avail itself of transit-oriented, reduced requirements for off-street parking, it must agree that residents of the new development cannot also participate in the on-street residential parking permit program.* This requirement encourages residents of such developments to use public transportation over motor vehicles, and ensures that developers are not simply able to shift the parking burden that their new projects create from their own premises to the public streets.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "MaryAnn and Richard Nash". The signature is fluid and cursive, with the first name "MaryAnn" being more legible than the second name "Richard Nash".

MaryAnn and Richard Nash

¹ D.C. Office of Planning, Glover Park Commercial District Analysis, Final Report (October 2006), at p. 5.