



COALITION FOR SMARTER GROWTH

Testimony before the
D.C. Zoning Commission regarding:

SUPPORT for Case No. 08-06 (Comprehensive Zoning Regulations Review: Parking)

by Cheryl Cort, Policy Director
November 15, 2010

Please accept these comments on behalf of the Coalition for Smarter Growth, a regional organization based in the District of Columbia focused on ensuring transportation and development decisions are made with genuine community involvement and accommodate growth while revitalizing communities, providing more housing and travel choices, and conserving our natural and historic areas.

Overall, we strongly support the proposed regulations in Case Number 08-06 to largely eliminate minimum vehicle parking requirements and establish maximums. We support enabling shared parking to fulfill minimums, carsharing requirements, and bicycle parking and related facilities requirements.

We have been extensively involved in the Zoning Review and the Comprehensive Plan revision. I participated in the parking workgroup and actively engaged in many of the discussions and correspondence around the proposed vehicle parking standards. I've submitted extensive testimony, data and analysis regarding the harm of minimum parking requirements, especially in areas with high transit accessibility. I request that tonight's testimony be viewed in light of the several submissions I have made to the record for this process.

The need to largely eliminate minimum parking requirements: DC Office of Planning has provided a thorough explanation of the need to revise DC's 1950s zoning regulations for vehicle and bicycle parking and largely eliminate vehicle parking minimums. The costs of oversupply of parking are high, if obscured. We know that parking supply is a key determinate for how many vehicle trips a particular land use will generate. We welcome the resurgence of DC with vacant buildings rehabilitated and vacant lots turned into mixed use buildings, but we agree that this new activity in businesses, employment and housing cannot bring with it a tide of new traffic flowing into new parking spaces. Our street network does not have the capacity to manage these increased volumes. Instead, we need to ensure that alternatives to driving are increasingly attractive, and that living in the city closer to jobs is more affordable. Largely eliminating minimum parking requirements and establishing maximums in transit zones and downtown are critical steps to ensuring our city's economic growth is sustainable. Eliminating minimums and instituting maximums will also make housing and business space less costly.

Appropriate parking maximums and special exceptions: Regarding the proposed alternatives for parking maximums, we have considered the OP, DDOT original and modified maximums and consulted with businesses contacts. Setting the right limit on where the city needs to intervene to protect the broader public interest from the harms of too much parking is a difficult exercise. We believe that OP's limits are far too conservative to protect the public interest.

ZONING COMMISSION
District of Columbia

CASE NO. 08-06

We believe that both DDOT proposals are sound approaches to setting a maximum in a way that does not interfere with attracting quality, responsible and profitable development. DDOT's main argument for maximums is that the street network cannot function with significant increases in parking due to the added vehicle trips it would generate. While we think that the original proposal from DDOT would work, we accept the modified proposal which increased the number of spaces in a single facility from 250 to 500 in TOD areas, and the ratio for retail to 2.5 spaces per 1,000 gross square feet. Using these parameters, the misguided oversupply of parking at DC USA would have required a reduction or special exception. It should be noted that DC USA had to obtain a variance to reduce its parking ratio.

We concur with the use of special exceptions as a way to provide flexibility to developers to balance competing demands of a project. A special exception to build more parking than allowed under the maximum limit requires a Transportation Demand Management plan (TDM) approved by DDOT. A TDM plan reduces the number of vehicle trips generated through a variety of incentives such as transit passes to employees and residents, carharing memberships, and enhanced bicycle facilities. We believe that offering a special exception with a TDM plan is a reasonable approach to setting an easier standard to meet than a variance. It also creates a predictable process for developers. The requirement for a TDM plan is critical because it establishes the measures to reduce vehicle trips generated from the parking supply of the project. This is a sensible approach that protects the public from excessive vehicle trips on local streets while responding to the need to provide flexibility and predictability to developers.

DDOT should address on-street parking management, which is the real conflict: The zoning code's mandates for off-street parking supply are a costly and ineffective response to addressing neighbors' concerns about competition over undervalued on-street parking. We suggest that DDOT better manage on-street parking demand with a more market-based response to residential parking demand, and conflicts with spillover from commercial parking demand in residential neighborhoods. DDOT acknowledges this but needs to do much more. Increased management includes extended hours and weekend days for Residential Parking Permit (RPP) enforcement, elimination of 2 hour free period in high demand RPP zones and replacement with multispace meters for visitor parking; matching the number of RPPs to available curbspace through market pricing in high demand zones (e.g. Adams Morgan, Columbia Heights). We note that DC USA's 1,000 poorly utilized off-street parking spaces have next to no effect on demand for on-street parking in the Columbia Heights neighborhood. DDOT has piloted some new management measures for on-street parking in this neighborhood, but needs to do more.

Bicycle parking standards are key to expanding bicycling as a significant transportation mode: We want to reiterate our support for the proposed bicycle standards. Bicycling is increasing as the city offers more on-street facilities and trails, and as a growing population chooses to be close to jobs and services. Showers and changing rooms are also important for bicycle commuters and also offer a more general amenity to workers who wish to run during lunch. Encouraging more bicycling is desirable for the city because it is a transportation mode that emits no pollution, requires less space on the street and is low cost. Bicycling and walking also provide health benefits through physical activity.

In conclusion, we urge you to adopt these proposed regulations. We believe this proposal fulfills the intention of the 2006 Comprehensive Plan and builds on the strength of our city as we prepare for a future of rising demand to live and work in efficient, convenient, walkable, affordable, and transit-accessible communities.

Thank you for your consideration.