

DC Zoning Commission
Office of Zoning Hearing Room
441 4th Street, Suite 220

December 14, 2010.

RE: Support for Case 08-06 – Parking (Comprehensive Zoning Regulations: Chapters B-15, B-16)

Dear Commissioners,

The original purpose of zoning in 1916 in New York City was to regulate development based on scarce resources: sunlight and ventilation. Now, the DC zoning commission is being called upon to regulate development of another scarce resource, but in this case the resource is road capacity.

Washington is in an enviable position that few cities have been in: to stop congestion. Only zoning can stop congestion in DC. Bike lanes, better transit, capital bikeshare, safer intersections, Zipcar, these are all important and provide people with alternatives, but they will not stop congestion. Parking supply and price are the most important factors in someone's decision to drive or not, and therefore the number of vehicles on the roads. Only by reducing the number of vehicles on the roads, can we reduce congestion. Only the Zoning Commission can stop congestion.

This is a decision about values. Does DC want to accommodate everyone who wants to drive and accept congestion at the expense of ambulance services and deliveries? Does DC want to encourage high-income earners to live in Fairfax or in Eckington? Does DC want residents to shop at Gallery Place or at Tyson's Corners? These are all affected by the supply of off-street parking.

Indeed, Washington is different from other cities with our high share of workers who commute from outside the District; but again, we have alternatives to driving. Hundreds of millions of dollars have been spent on our world class metro system, our bus network is continuously being upgraded, bicycling and walking are becoming safer and more commonplace, and it is easier to hail a taxi in DC than it is in New York City. People are moving back into Washington, making all of these alternatives more practical as trip lengths get shorter.

Will we stay competitive if we limit future parking? The recent economic collapse has proven what many have been arguing for a long time: that urban space is more important to the economic well-being of a city than parking. Looking to our neighbors to the north and south, Washington is in a much better economic situation, even though Arlington and Silver Spring have more parking. With more parking comes more traffic and more congestion, and that degrades urban space. Besides, a change in parking regulations now will not eliminate parking overnight. The transition will be slow, but in the long run will keep Washington competitive.

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Working in the Golden Triangle, every day I witness the circus of the “commute,” the reality of unlimited parking. Streets are congested, people in vehicles are impatient and aggressive, and honking drowns out conversations. I urge the DC Zoning Commission to prevent this in the newly developing areas of NOMA, the Southwest Waterfront, and other new developments.

Is there a parking shortage? There is no such thing, just as there is no such thing as a shortage of gold. There is, however, the unfortunate situation when parking is priced too low (or free). If less off-street parking is built, prices will rise accordingly for off-street parking, and DDOT will adjust on-street parking to maintain open spaces. For most in the central business district whose firms offer free off-street parking as a non-taxable benefit, they will not be affected. For the rest of us, we will reconsider driving to work, to Macy’s, or to the grocery store.

For these reasons, I urge the Zoning commission to support the highest standards of parking reform to control congestion and promote economic growth in the long run. I support the proposal from DDOT, however, with the following modifications:

1. Eliminate parking minimums for private vehicles District-wide – While working at DDOT, I literally never saw a development try to build too few spaces. In fact, one development in Shaw, directly across the street from the Metro station, once wanted to build 60 parking spaces for 10 residential units. Neighborhood pressure and market forces always push developers to build substantial parking, eliminating the need for minimums. However, in the event that no parking is built, developers and businesses will focus their attention more to the neighbors and residents who would not drive there, instead of trying to attract out-of-state residents, such as Lauriol Plaza on 18th and T Streets, NW (despite providing parking, their patrons are responsible for back-ups at their parking lot and valet service, not the businesses without parking). More businesses that are focused on residents make the District a more attractive place to live. Successful areas with very little parking include Georgetown, Adams Morgan, Dupont Circle, and Capitol Hill, precisely because they focus on the quality of the urban space. In the case of spillover parking, DDOT regulates curbspace parking practically everywhere, and will continue to develop new strategies because of both political pressures and the desire to raise revenue. Parking minimums should, however, be maintained for car-share spaces.
2. Reduce parking maximums in CBD and TOD areas to 1 space per 2,500 ft² (0.4 spaces / 1,000 ft²) – Developers are currently building approximately 1 parking space per 1,500 ft² (0.67 spaces / 1,000 ft²) of office space, and the resulting congestion already overwhelms built out areas of the CBD and Columbia Heights. The DDOT and OP proposals are too modest and will not affect future development patterns, except for the few exceptions with grossly over-exaggerated parking ratios. Developers in the CBD have no incentive to build less parking because of the desire to attract the highest-paying clients, and then

blame DDOT for not managing congestion. Therefore, to reduce future congestion, all new developments must be held to the same standard. Table 1 shows sample parking standards for similar European cities.

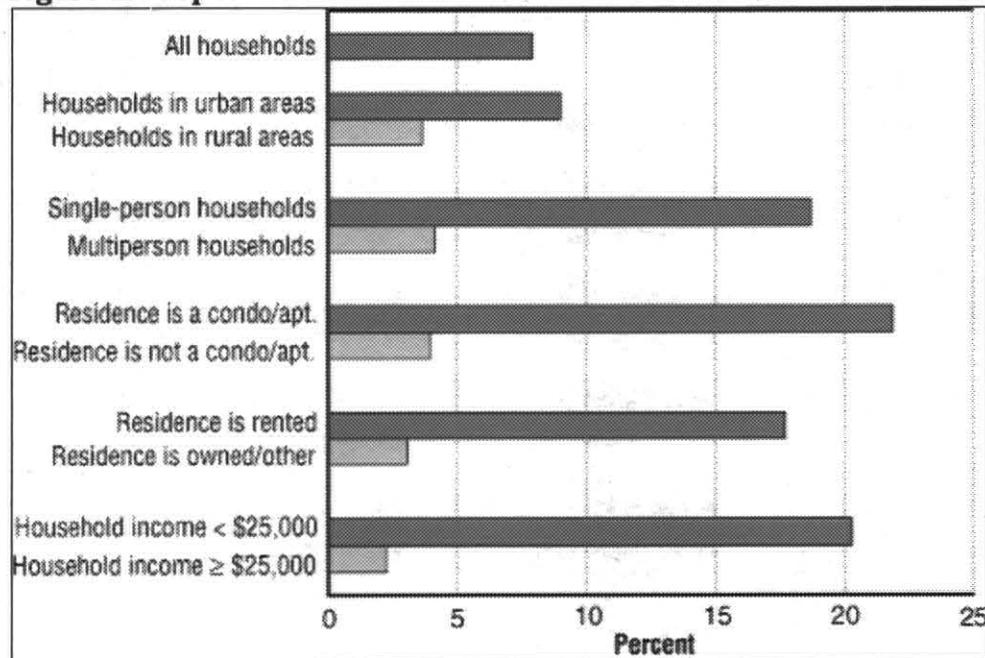
Table 1. Parking Standards for New Developments in Select European Cities

City	M ² of Floorspace per Parking Space	Parking spaces per 1,000 ft ²
Paris	250-166	0.37-0.56
Lyon	100-43	0.93-2.16
Madrid	100	0.93
Barcelona	100	0.93
Hamburg (has sealed parking in CBD at 30,000 Spaces in 1976)	65-40	1.43-2.92
Frankfurt	50-30	1.86-3.1
Antwerp (high public transport accessibility)	600-300	0.15-0.31
Antwerp (low public transport accessibility)	120-60	0.77-1.55
Hague (CBD and around 2 main train stations)	1 space/10 employees	0.4 (1 space/2,500 square feet)
Hague (zone around CBD)	1 space/5 employees	0.8 (1 space/1,250 square feet)
Hague (rest of city)	1 space /2 employees	2

Source: *Parking Management: A contribution towards Livable Cities (Tom Rye, 2010)*

3. Set parking maximums at 1 space per 1,000 ft² in the rest of the District – If DC is to plan based on increased growth and density, we need to prevent future congestion. By setting these loose maximums, which would amount to approximately 1 space for every four employees or 0.8 – 1.5 spaces per residential unit, this will prevent future congestion in these areas. We should especially encourage lower parking ratios for multi-family housing, lower income housing, and single person households, because these are the groups that most often live without cars (Figure 1). Exceptions to this should be made for business with large fleets, such as FedEx, car rental agencies, police, etc.

Figure 1. Proportion of Households Without Vehicles in the U.S.



Source: Bureau of Transportation Statistics, 2001

4. Support bicycle parking minimums – in order to accommodate trips of 1-5 miles, bicycle parking should be required. These should be situated in the most accessible areas (not in the farthest corner of the parking garage, as is customary). These minimums should be increased where vehicle use or ownership is typically low, such as schools, multi-family dwellings, and affordable housing.

Thank you for the opportunity to comment, I feel confident that the Zoning Commission will act appropriately for the future of Washington and its residents and businesses. Feel free to contact me with any questions.

Sincerely,

Christopher Ziemann
743 Varnum St NW
Washington, DC 20011
Christopherziemann1@yahoo.com