

Advisory Neighborhood Commission 4A

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December 15, 2010

District of Columbia Office of Zoning
Secretary of the Zoning Commission
441 4th Street NW Suite 200/210-S
Washington, DC 20001

Subject: Case Number 08-06
Comprehensive Zoning Regulations Review on
Chapters B-15, B-16, and B-17

Attn: Sharon Shellin
Secretary of the Zoning Commission

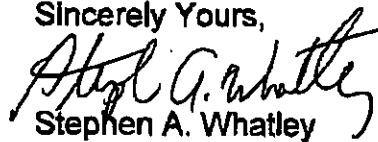
On December 7, 2010 at an open, duly noted Advisory Neighborhood Commission (ANC) meeting, ANC 4A voted to support the testimony of ANC Commissioner Gail Black (ANC4A08) in her testimony before the Zoning Commission on November 15th, 2010. Commissioner Black testified concerning Case No. 08-06, *Comprehensive Zoning Regulations Review on Chapters B-15, B-16, and B-17*.

There was a quorum present at the ANC meeting. Seven of eight commissioners were in attendance. The vote to support was unanimous. ANC 4A concurs with the testimony.

I have attached a copy of Commissioner Black's testimony.

If you have any questions please feel free to contact me on 202-720-4590.

Sincerely Yours,


Stephen A. Whatley
Chair
ANC 4A

ZONING COMMISSION
District of Columbia
CASE NO. 08-06
EXHIBIT NO. 89
ZONING COMMISSION
District of Columbia
CASE NO. 08-06
EXHIBIT NO. 89

**TESTIMONY OF GALE BARRON BLACK (ANC 4A08)
BEFORE THE ZONING COMMISSION
FOR THE DISTRICT OF COLUMBIA
PUBLIC HEARING ON MONDAY, NOVEMBER 15, 2010
CASE NO. 08-06
(Comprehensive Zoning Regulations Review
on Chapter B-15, B-16 and B-17).**

Thank you for the opportunity to offer testimony. My name is Gale Barron Black. I am the Advisory Neighborhood Commissioner for ANC 4A08 and am here today in that capacity as an individual and ANC commissioner for ANC 4A. This matter was raised at the ANC 4A November meeting, but we did not have the time to review the proposal. We did authorize participation by the ANC on this important topic.

Let me begin by noting that the ANC 4A did not receive a full copy. We received a document that contained only the odd-numbered pages in a double-sided set. This raises an issue of whether there was sufficient public notice to other ANCs.

I am here to share my questions and concerns regarding the creation of rules establishing public parking maximums and imposing requirements for car-sharing and bicycle storage.

No need has been shown to justify imposition of public parking maximums.

I oppose the proposal as written. It is unduly complicated and does not meet the needs of DC for areas like Ward 4 which has seniors, individuals with disabilities, and others who drive. Ward 4 residents rely on their cars and public transportation options are not always feasible.

DC transportation network experiences significant congestion. The city has not added more lanes and parking. DC has 1,153 miles of roadway, 229 vehicular and pedestrian bridges and a world-class mass transit system. The physical configuration of the roads and streets have changed little since the inception of the L'Enfant Plan, except incrementally, DC is losing its vehicular lanes and parking and started to deviate from its comprehensive transportation plan. Not all of our roads have been kept operational. Not all roads have the same number of public vehicular lanes available. So, we are getting by with less.

DC has grown to be one of the country's most densely populated cities and one of the region's largest employment centers, with more than a half million residents and nearly three quarters of a million jobs. As the national's capital, it is also a popular tourist destination.

Parking is a huge issue. This short-sighted proposal could make it a lot worse.

In 2000, there were 248,590 households in the District, according to the Census. Thirty-six percent were zero-car households, compared to the national average of 10%. Forty-three percent owned one car and 19 % were multiple car households.

There are an estimated 260,000 on-street parking spaces in the District. (DC Transportation Vision, Existing Conditions Report 2003), p. 9. In addition, there are 140,000 off-street parking spaces, according to conversations with officials of the Washington Parking Association. This makes for a combined total of only 400,000 spaces in the district.

Metrobus is the fifth largest bus network in the country. Today, more than 13 percent of District residents bicycle or walk to work, and more than 43 percent car pool or use transit to get to work, according to the 2000 census. Among large US cities, only New York has a higher percentage of resident who commute by public transit, and only Boston has a higher percentage who walk to work.

DC has 8 miles of bicycle lanes, 64 miles of signed bicycle routes and 34 miles of off-street trails.

Only 28% of District -based work trips originate in the city. More than 71 percent of District -employed employees commute in from the suburbs. Stated a different way, seventy-two percent of the trips ending in the District each day originate outside of the District.

This proposal is inconsistent with transportation mission to move people and goods.

The function of the Transportation element was to improve accessibility and transportation choices in the District, enhancing the quality of life for District residents and visitors by ensuring that people, goods and information move efficiently and safely, with minimal adverse impacts on residents and the environment.

This is taking away from dedicated public transportation purposes and converting them to commercial ones that do not provide the maximum public benefit.

The District operates more than 15,000 parking meters. Parking meter revenue has been recently reported as high as \$18 million per year and was \$11.7 million for Fiscal Year 2001

Yet, this proposal plans to take the space for parking for 20 cars to accommodate 200 bicycles. Given the 72 inch space requirements suggested for bicycles, I doubt that you would accommodate 200 bicycles. Will the bicycles net the city the same revenue?

There has been no showing that we have an over-supply of parking. What is excessive parking? What would be the impact on the Crestwood Apartments at 3900 16th Street, NW, which is within ANC 4A08?

This calls for no parking area with more than 500 spaces. So where do students park? What does the Washington Hospital Center do?

Specific concerns or questions

1502.2 The expansion of a use within a building triggers additional parking requirements only when its gross floor area is expanded or enlarged by 25% or more. The additional minimum parking requires shall be calculated based upon the entire gross floor area added. Wouldn't it make more sense to look at density or whether there is a greater demand for parking by looking at the number of people parking there and not the space?

1502.6 When property changes or adds a use category, the minimum number of parking spaces stays the same and it "shall be assumed that the previous use proved the minimum number of spaces required." 1502.6 Why should we make that assumption?

1502.13 *Required parking spaces* may be used as Commercial Parking when it is permitted as a use category. Are we illegally surplusing public property here?

1502.15 *Car-share parking spaces* may be counted toward fulfillment of a minimum parking requirement. So, we have to pay for what we used to get free?

1503 Maximum Parking Requirements Apply to All Zones, with limits of 500 spaces.

1504.7 A Property owner might be notified of an intent by others to use their space. Those required car-share spaces may be made available to non-residents. This seems to be a taking of property without due process. Is this in our economic development interest?

1505.1 Residential units based on the number of dwelling units. So, does this mean there is only one unit for one space? For high end residential dwellings, there may be a desire to have two spaces. To attract million dollar investments, why should we limit this? Are we risking potential real estate taxes by limiting what DC can offer?

If there are parking maximums, does this mean that someone has to lose their current parking space? What will be the impact on apartments like the Crestwood Apartment? If the spaces are limited, won't that mean that those who used to have a spot will start searching in the adjoining residential neighborhoods for their parking?

If the required car-share spaces may be made available to non-residents, then apartment building residents would not be guaranteed the spots and security could become an issue because the spots could be made available to non-residents.

1506.4 Parking spaces shall be 20 feet from all lot lines. Given the existing physical layout, is this feasible? Current parking spaces may be right up against the lot lines.

1507.3 Access requirements – All parking spaces shall be accessible at all times from a driveway. What does this mean? Again, is this realistic?

1507.5 & 1507.6 – driveway location provisions in 1507 may duplicate the requirements covered by DDOT's permitting authority to approve curb cuts.

DDOT has reviewed the past public space permit applications and found that a moderate number required exceptions. Are you duplicating efforts? Why is this a zoning matter? Why is Zoning proposing legislation? The Executive Branch executes. The Council legislates.

- 1507.9 A driveway opening on a street shall be 28 or 36 feet from an alley?
- 1507.15 12% grade and all weather surface required for driveways. This could be expensive to maintain and install.
- 1509.2 requires porous or pervious surface.
- 1512.2 Downtown zoned exempted as is attendant parking. Why? And why did the West End stop having parking maximums in the 1980s.

I understand that the District has an ambitious goal for increasing the percentage of people using bicycles to move around the city, as a way to relieve pressure from a crowded road network. I have been on the S2 bus on 16th Street, NW when a bicyclist was in front of a Metro bus. This caused the bus to lurch abruptly to avoid hitting the person on the bicycle. This created a dangerous situation. Encouraging more of this does not seem like a smart move.

There is nothing about wheelchairs. There is no mention of the needs of families or seniors. There is no mention of electric cars or alternate fueling stations or battery rechargers. Again, the regulation does not address the need to accommodate staff, caretakers, students, individuals with disabilities and visitors to private homes. And there is no mention of how this will be enforced and by whom.

Rather than attracting people to return to DC, this could have the effect of pushing people away. Empty nesters who return want a place to park their car. Professionals who work here need to know that safe adequate parking is available. Those who have signed leases need to know that their spaces will not be turned over for a car-sharing vendor.

Finally, DC needs to be able to net the benefits for its public space and not lose the tax benefits gained by public parking and real estate taxes. It is not in DC's financial interest to give up public spaces to a commercial business. Thank you; and I ask that this be made a part of the record.

Gale Barron Black, Advisory Neighborhood Commissioner for ANC 4A08
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