

COALITION FOR SMARTER GROWTH

December 10, 2009

Mr. Anthony Hood
Chairman, D.C. Zoning Commission
District of Columbia Office of Zoning
441 4th Street, NW, Suite 210 South
Washington, DC 20001
Via Fax: 202-727-6072

RE: Case Number 09-03: (Skyland) Support with reduced parking

We support the proposed redevelopment proposal for the Skyland Shopping Center. We welcome this mixed use development that provides a modest amount of below market rate housing. Our chief concern is that the project is excessively over-parked – wasting resources on too much parking that could be used for more productive uses.

We urge the Zoning Commission to reduce the excessive amount of parking proposed for the project. We concur with the recommendations of the Department of Transportation and the Office of Planning that this project is providing substantially more parking than is appropriate for the site.

We are concerned that the 1,698 parking spaces proposed for the project are based on suburban single use land use assumptions that do not account for transit access. This census tract that this project is located in has a high amount of transit use, with 28 percent of workers riding the bus, Metro or walking to work. One third of households in the census tract do not own a car, another 40 percent own only one car. Among renters, nearly half do not own a car (46 percent), and among owners, nearly half own no or only one car. The high transit ridership and low car ownership rates of this area are not typical characteristics assumed by conventional traffic models. Thus the proposed parking ratios for the housing and retail users are inappropriate for the site.

Dedicating too much land and money to vehicle parking is harmful and carries a number of opportunity costs. Too much parking is harmful to the city and neighborhood because it encourages unnecessary traffic when alternatives to driving could be encouraged and reduce the amount of traffic generated by the site. Space and money dedicated to parking could be reallocated to more productive uses such as a more pedestrian-friendly features, Transportation Demand Management (TDM) benefits such as discounted transit passes for workers and residents, a transit trip pass equivalent to parking validation, attractive bicycle parking, enhanced bus facilities, taxi vouchers, free goods delivery, and on-site Zipcars. If the project were redesigned to take advantage of less space consumed and cost by parking, additional or more affordable housing or retail space, or civic/recreational space could be provided.

ZONING COMMISSION
District of Columbia

CASE NO.

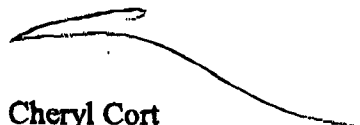
09-03

Affordable Housing – while we applaud medium density housing and commercial space at this location, we are concerned that the income targeting for the 30 percent of this mixed income project on government-owned land is too high. First, 80-120 percent AMI should not be included as an affordable housing benefit. This is substantially above D.C.'s median family income. Secondly, historically, the city has used NCRC properties and city land to provide affordable housing opportunities to those earning well below D.C.'s median family income – at 60 and 30 percent of area median income. We ask that the housing affordability be targeted to lower income levels to truly benefit low income working families.

Overall, we are enthusiastic about this project and believe it will be a great contribution to the city and the neighborhood. With our suggested changes, this project can be even better.

Thank you for the opportunity to comment.

Sincerely,



Cheryl Cort
Policy Director



The District has lost nearly \$2 million -- or \$100,000 a month -- since the \$40 million taxpayer-funded garage opened in March 2008. Many of the 1,000 spaces at the garage beneath the mall in Columbia Heights remain vacant. (By Marvin Joseph — The Washington Post)

At NW Mall, So Many Spaces, So Little Need

D.C. Losing Millions On Empty Garage

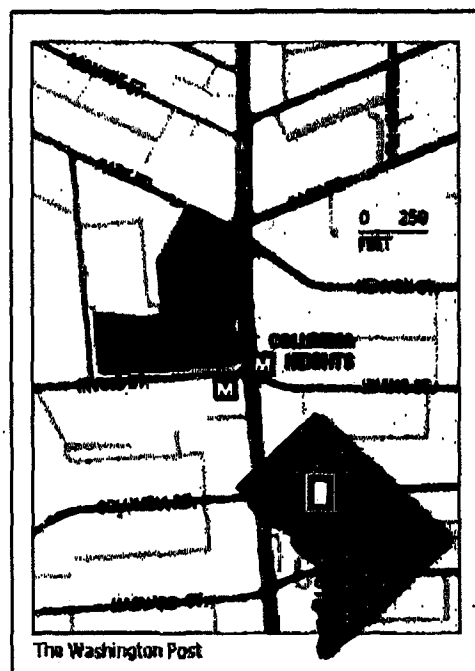
By Paul Schwartzman
Washington Post Staff Writer
Thursday, October 8, 2009

The prediction seemed sound: A shopping mall dropped in the middle of Washington would deliver street-snarling traffic to an otherwise peaceful residential neighborhood.

The District's solution was to build a parking colossus, a \$40 million taxpayer-funded garage beneath the Target-anchored mall in Columbia Heights. Yet, even as waves of shoppers come and go, the 1,000-space garage remains empty enough that the operator typically blocks off one of its two sprawling levels.

The District has lost nearly \$2 million -- or \$100,000 a month -- since the garage opened in March 2008, numbers that make Valerie Santos groan when she considers the city's decision to build the structure.

"I don't want to say it's a quote, unquote, mistake. At the time the District did what it had to do to attract a retailer it sorely wanted," said Santos, deputy mayor for planning and economic development. "Am I happy about the operating deficit? Of course not."



The empty garage is part of the evidence that District officials cite as they rewrite 50-year-old regulations so they will no longer require developers to build a minimum number of parking spaces for new retail outlets, offices and apartments in areas near Metro stations. Instead, the District would like to leave it to developers to analyze market conditions and determine the appropriate parking levels.

"The concept is that in a city like ours, with so much transit and so many transportation choices, demand for parking is on a glide-path downward," said Harriet Tregoning, director of the District's Office of Planning. "It's become more the fashion not to get in your car."

The District's evolving view of parking mirrors one that has occurred from California to Britain, as civic leaders and planners have sought ways to promote dynamic, pedestrian-friendly street life.

"You shouldn't think of this as any pioneering reform in Washington. You're following the pack, and you're a long way behind," said Donald Shoup, a University of California at Los Angeles planning professor. He said cities such as Boston, San Francisco and Chicago don't impose minimum parking requirements. "Every place we admire does not have a lot of parking."

When the District sought to spur development in Columbia Heights a decade ago, the city was emerging from financial free-fall. The District's zoning regulations required that parking be provided at DC USA, as the mall on 14th Street NW came to be called. A garage was also needed to persuade Target to open its first store in Washington, in a working-class neighborhood still scarred by the 1968 riots, D.C. officials say.

"If they didn't have the garage, they weren't going there," said D.C. Council member Jim Graham (D-Ward 1), who represents Columbia Heights. "My thinking was, 'I want a retail center.' "

District officials say that DC USA, which includes Target, Best Buy and Staples, has generated \$10 million in tax revenue for the city and that the mall has transformed Columbia Heights. Many shoppers walk to DC USA or arrive by bus or Metro. The year after Target opened, traffic at the Columbia Heights Metro station jumped 25 percent, the most rapid increase of any stop in the city, planning officials say.

The garage is another story, even though its rates are relatively cheap at \$1 an hour for the first four hours. According to the District, the garage's best month was November, when an average of 47 percent of spaces were filled at 6 p.m., the peak hour. But from February through July, average peak use never exceeded 30 percent. In May, the worst month, shoppers filled an average 247 of 1,000 spaces, or 25 percent.

All those vacant spaces mean the District is losing about \$100,000 a month in operating costs, said Sean Madigan, a mayoral spokesman.

The chronic emptiness prompted David Alpert, a blogger who writes about transportation at <http://www.greatergreaterwashington.org>, to solicit ideas from readers about alternative uses for the garage.

"Maybe mini golf?" Alpert wrote a few months after the garage opened.

"Low income housing for those displaced by gentrification?" wrote a reader.

"Roller hockey tournaments? Indoor skate park?" suggested another.

District officials said Washington Hospital Center is among the organizations expressing interest in the garage. But the District cannot lease space without the consent of Target and the mall's developer, Grid Properties of New York.

In an e-mail, Hadley Barrows, a Target spokeswoman, declined to talk about the garage's performance. She said the design of the Target at DC USA "took into account that the guests at this store were more likely to walk than drive." The vacant parking spaces do not reflect a lack of activity at the cash register. "The store continues to meet and exceed our expectations," she wrote.

Drew Greenwald, Grid's president, said the District, Target and his company are discussing ways to fill the garage, including leasing spaces to nonprofit organizations, commuters and monthly parkers. An agreement will be reached "definitely by the end of the year," he said.

During the mall's planning, Greenwald said, traffic studies and parking consultants suggested that "people would drive from all over," though he added, "studies are only as good as the data at the time."

"The next project, people are now going to be able to say, we don't need that number of spaces," he said. "When you're a pioneer, you have to make adjustments."

Cheryl Cort, policy director for the Coalition for Smarter Growth, who opposed the garage from the outset, said the designers based their concept on a suburban, not urban, model. Census data, Cort said, showed that a preponderance of households in the area did not own cars.

"It was obvious that this was a very bad investment," she said. "I hope this teaches the city a lesson."

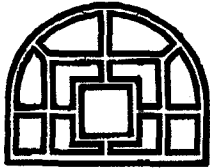
Parking garages proliferated across the country in the 1950s when planners began requiring them in new development to siphon off traffic. Yet the added parking only encouraged more driving and traffic and drove up construction costs on all types of development, said Patrick Seigman, a principal at Nelson Nygaard, a transportation planning firm. A single underground parking space can cost as much as \$50,000, which gets passed along to buyers and lease-holders.

"We're spending an egregious amount of money on parking that's not necessary," said Brian O'Looney, an architect at Torti Gallas, which designed two apartment buildings in Columbia Heights, across from DC USA.

One of those buildings, the Highland, has been unable to lease a third of its 240 spaces, even as the apartments are almost all rented.

Among the alternative uses that have been considered by developer Chris Donatelli is a bowling alley.

"It would've been much simpler not to have built them in the first place," he said.



COALITION FOR SMARTER GROWTH

FAX COVERSHEET

TO: Mr. Anthony Hood
Chairman, D.C. Zoning Commission
FAX: 202-727-6072

FROM: Cheryl Cort

FAX:

RE: Case Number 09-03: (Skyland)

PHONE:

CC:

PAGES: (including coversheet)

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DATE:

Comments: