

July 28, 2020

Mr. Frederick L. Hill
Chairperson
DC Board of Zoning Adjustment
441 4th Street, NW
Washington, DC 20002

via: bz submissions@dc.gov

RE: **Support** for BZA Case No. 20266 – 3400 Connecticut Ave. NW, for a special exception from the minimum parking requirements

Dear Chairman Hill and Members of the Board:

Please accept these comments on behalf of the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization in the Washington, DC region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We are pleased to express our support for the Macklin proposal (3400 Connecticut Ave. NW). We strongly support a special exception from parking spaces in order to bring 36 new homes close to the Cleveland Park Metro station and business district in a mixed use development. The proposed project advances many DC Comprehensive Plan and Mayoral goals while conforming to the 2016 zoning regulations. The proposal would add new vitality to this Metro station business district in the Rock Creek West planning area. Rock Creek West has lagged behind the rest of the city in meeting new housing needs as the city has grown, and lags in offering more affordably-priced homes. This thoughtful and modest project helps advance DC's goals to make Rock Creek West more welcoming to a diversity of people.

The 2016 zoning regulations created flexibility for situations like this case. The zoning regulations established a new view of vehicle parking – while still required in this zone, a special exception can be granted for a number of positive reasons. In this prime main street location, where residents walk to transit and neighborhood services, the proposal offers a well-designed building and solid TDM plan to reduce the need to use or own a private vehicle. These characteristics and commitments for the project demonstrate the threshold for the parking exception have been met. When the updated zoning regulations changed from the old, stricter 1958 standard of a variance for parking requirements to a 2016 special exception standard, the reason to *not* provide parking shifted from a rigid compulsion to a list of reasons why an alternative to vehicle parking would be appropriate for a specific site and use.

The zoning regulations state that special exceptions are permitted when:

...the provision of the required number of spaces would be contrary to other District of Columbia regulations; or impractical or unnecessary due to the shape or configuration of the site, a lack of demand for parking, or proximity to transit. (DC Zoning Regulations, Subtitle C-703)

The 2016 zoning regulations for this situation accommodate a project where vehicle parking is not possible. Without relief, the benefits of the new development would be lost due to lack of feasibility, and thus would be contrary to other important District goals. The plan advances the city's goal to reduce the disparity in new affordable homes in Rock Creek West, and overall new housing opportunities to reach the city's goal of 36,000 new homes by 2025. Cleveland Park is a desirable neighborhood, and people want to live here. Many people, who do not need to own their own car would be eager to live in a new apartment in Cleveland Park, so close to Metro, buses, and main street businesses. This is the kind of modest change in parking requirements that the zoning regulations were designed to accommodate.

Vehicle parking is not possible or feasible at the constrained site, and the TDM plan offers a sound alternative to complying with parking requirements. The plan will expand Capital Bikeshare capacity at the Metro station across the street, and promote transit use to residents and workers. Cheap residential parking permits for surrounding public streets will not be available to new building residents, and the surface parking lot and curb cuts will be closed to improve the pedestrian environment. The pedestrian plaza is a major improvement over a surface lot and driveway. These benefits would not be possible without an appropriate exception to the parking requirement.

The zoning regulations clearly allow for exceptions to motor vehicle parking requirements in this case. It is a good trade – new homes for people at a Rock Creek West neighborhood main street, Metro station and bus lines; and fewer cars.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', with a stylized flourish at the end.

Cheryl Cort
Policy Director