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Comments on Vehicle Parking Chapter of the DC Zoning Update (Case No. 08-06-2)

General Comments

The Sierra Club is the nation's oldest and largest grassroots environmental organization with more than 750,000 members nationwide, including more than 3,200 in Washington, D.C. The Washington, D.C. Chapter of the Sierra Club has a long history of advocating for a balanced transportation system that minimizes the impacts of transportation on the environment and neighborhoods, respects pedestrians and bicycle users and maximizes investment in transit.

Global warming, the relentless march of suburban sprawl, energy insecurity and consumer sentiment demand that we make a major shift in our region's transportation investments toward high quality transit, streets that are safe for pedestrians and bicyclists and transit-oriented development and mixed-use neighborhoods. Simply put, business as usual should no longer be an option.

Unfortunately, the District's current parking regulations run contrary to these policy goals. These outdated parking regulation, which are better suited to an automobile-dependent suburb circa 1958, have considerably harmed the District's urban fabric and are largely responsible for our city's glut of cars and the air pollution and noise they impose on our neighborhoods.

The Office of Planning (OP) proposed parking regulations update is a step in the right direction. The problem in the District isn't a lack of parking; it's too many cars. By requiring an abundance of parking, current parking regulations have encouraged unnecessary driving which has in turn led to demands for even more parking. In addition, the current 50-year-old parking regulations reflect a suburban model of development that has considerably harmed the District's urban fabric and many of its historic neighborhoods. Much of the District's appeal and its major competitive advantage over its neighbors lie in its historic urban fabric. Current parking regulations have done much to mar that fabric with curb cuts, ugly surface parking lots and other land uses that are inappropriate in a dense, urban setting. Indeed, most of the District's most-vibrant and beloved

ZONING COMMISSION
District of Columbia

CASE NO. 08-06-2

EXHIBIT NO. 17

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neighborhoods fail to meet current parking regulations. Simply put, it would be illegal to build DuPont Circle or Capitol Hill under current parking regulations.

In general, Sierra Club supports elimination of parking minimums, creation of parking maximums, the use of transit oriented development zones, inclusion of car-sharing spaces in parking facilities, separation of parking facilities from street frontage, and provisions for bicycle parking. Sierra Club opposes surface parking lots that mar the neighborhood fabric, excessive curb cuts that endanger pedestrians, and excessive parking adjacent to Metro stations.

Specific Comments

P.2.1 Minimums

Generally, minimums should be minimized. Also, for the two categories which currently require one space per 1000 sf, there should be no parking requirement for uses under 1000 sf.

Low-density residential – Much of the low-density residential development in DC does not have alley access. Sierra Club supports limiting the parking minimums to non-residential uses as proposed. Requiring one space for single-family dwellings in low-density residential would result in driveways and accompanying curb cuts that take away as much parking on-street as they provide off street. This will likely result in no net increase of available parking but will interrupt the sidewalks and decrease pedestrian safety.

Moderate-density residential – Most non-residential uses in moderate density residential districts are drycleaners, liquor stores, etc, which do not warrant a parking space. We suggest that the cellar areas not count against that total to ensure that retail businesses do not require parking spaces unless they have a substantial footprint.

Commercial – 1 space per 300 sq ft after first 3000 sq ft would be a lot of spaces for a medium size building. We agree with a floor of 3000 sq ft, which will allow narrow businesses to continue not devoting space for parking but would like to see the area per space increased.

TOD Districts – we support the inclusion of this category and its requirement for no parking minimums. OP should ensure that this requirement is written in such a way that it supercedes the stated minimums.

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P.2.3

Sierra Club strongly supports this paragraph, since curb cuts create dangers for pedestrians. Current zoning regulations have precluded valid uses under these circumstances.

P.2.5

Generally, Sierra Club urges OP to implement parking maximums. OP should consider using the current parking minimums as parking maximums, but in any case the maximums should not greatly exceed the proposed parking minimums.

P.2.6

Sierra Club strongly supports the car sharing requirement.

P.2.7

We are concerned that this allowance may be used to circumvent parking maximums through providing vastly more car sharing spaces than would ever actually be used for car sharing.

P.3.1

Sharing a parking facility is made too difficult by the extensive list of conditions. In particular, "no negative impacts" is too vague. A parking study should not be required provided other requirements are met.

P.3.2-P.3.3

We support fees in lieu of meeting minimums. We are less supportive of an allowance to exceed the maximums, but support them if they allow OP to set more aggressive maximums. Also, the cost of a parking space should be defined in such a way that it reflects the full cost of adding parking; not just the cost of building the parking space but the opportunity cost of the land or building area. For example, a surface parking space should be priced at the cost of building the space plus the cost of portion of land occupied by the space and its associated approach.

P.3.6

An exception should be made for small lots, such as those that are less than 1000 sq ft. In addition, P.3.6.b should be deleted; the zoning code should not be written in a way that treats walking 200 ft from parking to destination as a hardship.

P.5.3

Sierra Club opposes curb cuts from arterial streets. This paragraph conflicts with the spirit (though perhaps not the letter) of P.2.3. If no alley or secondary street access exists, no on-site parking should be required or allowed.

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P.5.4.b

This paragraph should include a maximum width in addition to a minimum.

P.5.4.c

The maximum of 25 ft is excessive and would likely accommodate three lanes of traffic, which should not be allowed. Such a wide entrance would encourage speeding and would pose a serious threat to pedestrians.

P.6.1

This paragraph should be reordered to place the principal building option first. In instances where there is no alternative to an accessory building, Sierra Club supports requiring physical separation of parking from street frontage. The Sierra Club considers parking garage buildings very disruptive to the cityscape and encourages OP to further discourage their construction and to require, should a parking garage be built, ground-level uses other than parking in parking garages.

P.6.5 and P.7.2

The Sierra Club strongly supports these provisions. Parking can be very disruptive to the urban fabric, and these requirements limit that impact.

P.7.13

In general, Sierra Club urges OP to discourage the development of surface parking lots. Sierra Club supports requirements that mitigate the impact of surface parking lots. As such, Sierra Club supports requirements in this paragraph for landscaping and tree preservation. We also support the focus on tree health rather than just motor vehicles.

BP

Sierra Club applauds the inclusion of rigorous bicycle parking requirements as part of the proposed zoning update. In general with the exception below, we defer to bicycle advocacy groups such as Washington Area Bicyclist Association to comment on the details of the proposed bicycle parking requirements.

BP.2.1

Some of the minimums are too low. For example, an office building of 80,000 sf would be required to have only eight Class A spaces (and two Class B spaces). A typical 80,000 sf office building houses hundreds of employees.



Fax

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