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District of Columbia Zoning Commission
441 Fourth Street, NW Suite 210 South
Washington, DC 20001

Re: Case No. 08-06-2, *Office of Planning -- ZRR: Parking*

Dear Chairman Hood and members of the Commission:

I am writing on behalf of the Foggy Bottom Association ("FBA"), a membership organization made up of approximately 400 residents of the Foggy Bottom and West End neighborhoods. Since its founding in 1959 FBA has sought to improve and preserve the quality of residential life in these close-in neighborhoods.

FBA welcomes the Commission's review of existing zoning regulations, an effort that the Association hopes will lead to productive changes to the benefit of FBA members, many of whom are long-term permanent residents of the District. We offer the following comments on several recommendations in the Office of Planning ("OP") memorandum regarding parking.

Recommendation 1. The Association is very concerned about the proposal to eliminate required parking minima from the parking schedule, though we acknowledge OP's point about the need to maintain parking minima in areas where there is may be a "spillover" effect, *i.e.*, non-residential uses in predominantly single-family and rowhouse areas, as well as retail, office, restaurant or service uses in commercial corridors near (predominantly) single-family and rowhouse areas.

By any measure, the Foggy Bottom and West End neighborhoods are likely to need protection against a "spillover" of traffic from commercial neighborhoods. Our neighborhoods are close to the downtown business district, and the borders between that area and our neighborhood are being steadily eroded, most recently with the George Washington University 2007 campus plan that rezoned residential areas to a commercial district. There is, in addition, a fair amount of commercial development in the West End that co-exists with residential uses. Finally, our neighborhoods face challenges not only because they are in close proximity to these commercial

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Recommendation 2. The Office of Planning recommends imposing parking maxima for new development that would limit the number of parking spaces across the city, but with an emphasis on transportation hubs, such as Metro stations, and in Downtown. FBA has some of the same concerns that were outlined above, given its proximity to several Metro stations and to Downtown. Failure to require adequate parking in neighborhoods that abut downtown could cause serious “spill-over” effects in the form of a demand for on-street parking. Indeed, the Commission appears to have recognized the concern last year when it approved the GWU campus plan and Square 54 PUD, which contemplate more than 1000 off-street parking spaces near the Foggy Bottom Metro station, finding that this was an example of “transit-oriented development.”

Recommendation 4. OP proposes that developers can sidestep the need to seek variance relief from on-site parking requirements by allowing them to “buy” their way out of these requirements through contributions to a fund that the District Department of Transportation (“DDOT”) would administer. This proposal smacks of “zoning for dollars,” in which a regulatory program designed to protect neighbors can be eliminated if the price is right. This is bad public policy. There are no limits on a property developer’s opportunity to “buy” his or her way out proposed limits. The OP report does not contain sufficient detail about how this DDOT fund would operate, whether the funds would directly apply to protect affected neighbors, whether the existence of this fund would or could be used by the Council as an excuse to reduce DDOT appropriations, or other questions.

Thank you for your consideration of these concerns. The Foggy Bottom Association looks forward to continued participation in this public debate. Please do not hesitate to contact me if there is further information that I can provide.

Very truly yours,

Arthur F. H. Wood