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July 31, 2008

**Outline of Remarks Regarding
Potential Changes to "Parking" Requirements in DC Zoning Regulations**

1. Introduction and Documents Reviewed (Concept Report and Notice of Hearing)
2. Context of Case
 - a. Existing Provisions (1958, 1984, as amended)
 - b. Comprehensive Plan Amendments (2006)
 - c. Zoning Update Process (2008)
3. Goals and Directions Provided by Comprehensive Plan
 - a. Location, Location, Location (Generalized Land Use Map, and more)
 - b. Use, Use, Use (and Mixes Thereof)
 - c. Density, Intensity, Propinquity – or the Obverse
 - d. Form, form, form: High and Thick, Low and Thin, In Between (Range)
4. ^{Need} Parking (and Loading) are By Products of What is, or Comes to Be, Established
5. Zoning Provides Direction to Steer Development in the Directions Set Out by the Comprehensive Plan
 - a. The Basics of this Are the Essence of Paragraph 3, which is informed by the degree to which the effects of that contemplated can be achieved within the whole panoply of urban resources available (land, utilities, transportation, communication, etc.)
 - b. Parking, as such, cannot be fully studied in the context of any zoning "update" until the basics to which it is tied are themselves better settled.
 - c. Even then, the need for zoning controls must be weighed against the benefits of allowing market factors to operate freely – particularly if they produce no unacceptable adverse impact on the surrounding community or overall public: the test should be: Why is this regulation needed?
 - d. It seems possible that control on numbers (minimums and maxima) and metrics are less relevant to (adverse) impact than various aspects of operation (c.f., CM zone rules).
6. The concepts advanced at this time are stimulating, but mostly so vague as to make detailed comment impossible.
7. Reducing requirements in zoning may be a useful step, but one to be taken with care about situations that could see themselves as released from burdens of prior (current) regulations and various BZA or ZC Orders, which is a matter to which the Zoning Commission should give further thought prior to adoption of any changes.
8. Conversely, the proposed concepts move in quite the opposite direction for one mode of transportation – bicycles, without explanation or justification.
9. Finally, the proposed concepts appear to defer to as yet unspecified, and certainly unpromulgated, standards to be determined and interpreted by the DC Department of Transportation. This puts what are quintessentially zoning decisions outside the realm of both the Zoning Commission and the Zoning Administrator – which seems unwise.
10. Focus on critical elements (those in paragraph 3, then return to this question later (post DC-DoT))

ZONING COMMISSION
CASE No. 08-06-2
EXHIBIT No. 44

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