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Federation of Citizens Associations of the District of Columbia

ORGANIZED MARCH 5, 1910 • INCORPORATED JUNE 3, 1940

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Testimony of Federation of Citizens Association of the District of Columbia

BEFORE THE ZONING COMMISSION

Case Number : 08-06-2

Case Name : Office of Planning -- ZRR: Parking

Thursday July 31, 2008, 6:30 PM

Mr. Chairman and members of the Commission, my name is George Clark and I am pleased to testify here before you as President of the Federation of Citizens Associations of the District of Columbia and its 50 member organizations from across the City. As you know, we testified before the Council for several years about the need to fund a program for zoning revisions, and participated in your Roundtable on that subject last year. I am pleased to be a member of the Task Force working on that revision. Some of my observations are from inside that process.

At the outset, we join in the comments of the Committee of 100 on the Federal City about the process we are undergoing. We especially urge you not to take any votes on the vague and incomplete "discussion draft" presented by the Office of Planning. There are too many "TBDs" on too many important issues to make this document meaningful enough for a

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vote. And as a member of the Task Force I can tell you that this is not a proposal vetted by the Task Force or by a process of citizen input – it is OP’s draft, done in conjunction with special interest groups with ties to those who would be favored by the proposal, such as ZipCar.

As Marilyn Simon so effectively and cogently points out in her remarks for the Friendship Neighborhood Association, OP has not done the research that is necessary to support its conclusions. Instead it says that some cities have eliminated parking minimums in some limited areas of their cities and that therefore DC should do the same. OP does not point out the actual results of the no parking minimum experiment in other cities (most of which have greater parking minimums than DC does in the unaffected areas). Yet it calls these few experiments “best practices” simply because they fit its pre-existing bias on the subject.

As I said at the Task Force meeting, OP is asking the City to step off the edge of the Grand Canyon with this unprecedented experiment by doing an amount of research sufficient for only stepping off a curb. It makes no sense to just wish and hope that things will be all right. And the Comprehensive Plan says we shouldn’t do this. Policy LU-2.1.11, describes how the parking requirements for residential buildings should be defined, to “ensure that the parking requirements are responsive to varying levels of demand associated with different unit types, unit sizes, and unit locations.” It doesn’t say eliminate parking, nor do any of the other Comp Plan sections cited at page 5 of OP’s July 15, report.

And this brings me to the focus of my discussion. OP’s proposal is inherently and internally contradictory. The first and most glaring contradiction is that OP says we need to eliminate minimums because it will be good for the City to eliminate cars and traffic and will help save the environment. Environmental concerns are important and who could disagree with

such a feel good notion? I drive a hybrid, how could anyone disagree? Well OP itself does, because in the same report it says “don’t worry, eliminating minimums won’t matter because developers will build enough spaces anyway.” (Page 12). So we are to undergo this great experiment to eliminate parking, but don’t worry about it, because it really won’t happen? Why are we then wasting our time on the whole exercise? Equally phony is OP’s assertion that the price of parking and residential units will automatically be decoupled, even assuming that is desirable (page 12). Why is that true if developers will build what they would have under the old regulations anyway? Who are we kidding?

That question is answered by contradiction number 2. OP answers the concerns raised by Ms. Simons, a former professor of economics at MIT, by saying that even though no one really knows how the elimination of minimums has worked out, don’t worry! DC will be at the cutting edge on this subject, and won’t that be a groovy thing for us. Huh? We are supposed to gamble on the future of the transportation system in the Nation’s Capital so we can say we are forward thinking planners, willing to take unimagined risks with our 39 square miles not under federal jurisdiction? We are supposed to gamble that the young families moving into the city and helping to revitalize many of our neighborhoods will want to stay if they can’t have a car to buy diapers in bulk or go to day care, or buy a case of soda and not carry it home on the Metro and then the bus and then walk home 3 blocks with it? Well maybe some of those pushing this proposal think that all of us would be better people if we biked everywhere and didn’t drink sodas, but is that what zoning is for? And why do we want to push people to shop in the suburbs where they can find parking instead of circling the block or paying private garage rates that will skyrocket even more?

Contradiction number 3 is most fascinating. We are to rely on market forces in eliminating minimums, because developers will always act in their economic interest and will build enough parking. But we can't rely on those same market forces when it comes to maximums. There we have to regulate numbers because those dumb developers will cover every square inch of the City in parking lots instead of only building the ones they can sell. Again, this proposal isn't planning 440, as OP would have you believe. It isn't even Planning 101. It is social engineering 303.

And then we have contradiction number 4. OP's report acknowledges that parking minimums were born in zoning because of the spillover effect, whereby I can use your parking space and not have to build my own. But how does it account for this well-established and long-known principle? It says don't worry; it only affects a small portion of the City. Professor Simon shows that that is not true. And you can buy your way out of parking requirements (and have the neighbors provide parking) by going to DDOT, which then gets to keep the money. Is this sound parking or financial management?

And CSG's dismissive statement that "Even if people don't live near a Metro, they **probably** live within 1/4 mile of a bus line" is offensive on a number of grounds:

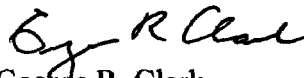
1. As is well-known, poor and minority neighborhoods are underserved by Metro and most reliant on surface transportation.
2. The statement cavalierly consigns large swaths of the City to a half-mile hike, irrespective of considerations of age, health, safety associated with time of commuting (e.g., people coming home late from shift work might not want to walk a quarter-mile at night). This is before you get to stopping on the way home for groceries and picking up kids at daycare.

3. Last and most offensive is the adverb "probably." While painstakingly researching and documenting points of principal interest to themselves, CSG waves its hands and consigns certain areas to their fate without even a backward glance.

OP asks you to buy the classic "pig in a poke." You don't know what you will get because they have not studied it, but be assured that it is the best pig out there – because we say so. Before this Commission even considers whether to bid on this pig it should demand that OP come up with data and analysis, not social theory.

I would be happy to take any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. R. Clark".

George R. Clark
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