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3901 Alton Place, NW  
Washington, DC 20016  
August 13, 2008

Anthony Hood, Chairman  
Zoning Commission  
District of Columbia Office of Zoning  
441 4th Street, N.W., Suite 210-S  
Washington, D.C. 20001

**RE: Zoning Commission Case 08-06-2, Proposed Amendments to the Parking  
Regulations 11 DCMR**

Dear Mr. Chairman:

We write in opposition to the Office of Planning proposal to eliminate minimum parking requirements and set maximum requirements as an alternative.

We were unable to attend the Zoning Commission hearing on the Office of Planning proposal to eliminate most minimum parking requirements and impose maximums (limits on how much parking a developer can build) for all minimum parking requirements for residential uses, and for many commercial uses in most zones. This would mean that developers of residential or mixed use projects along Wisconsin Avenue would not be required to provide any off-street parking for the residents, and might be prohibited from providing as much parking as they would like to include in a project.

Tenleytown, where we have lived for almost thirty years, is expected to see substantial development in the near future. We live only a few blocks from the subway and already experience some spillover parking both from the subway and nearby establishments. But all in all the current system works quite well. The subway is near capacity on the red line now.

The Office of Planning (OP) has ignored the basis for minimum parking requirements: to protect the District's residential neighborhoods from spillover parking. Existing spillover issues have been well documented in DDOT studies and it is a recurrent theme in the 2006 Comprehensive Plan. Without minimums, many developers would chose to provide no or inadequate parking. And the idea of setting maximums could prohibit developers from providing what they considered to be adequate parking.

OP has provided no basis for eliminating minimum parking requirements. OP has called their recommendation "progressive" and "best practices," but it should be termed "radical social engineering" because a review of the parking regulations in the other jurisdictions cited in OP's studies shows that those jurisdictions have, at most, eliminated only some minimum parking requirements and only in very limited geographic areas, usually only the downtown employment zone.

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Most of those jurisdictions, including some such as San Francisco and Portland have minimum parking requirements that are equal to or exceed DC's current minimum parking requirements. In fact, for Arlington, Virginia, there is a minimum parking requirement of 1 space per unit or higher for residential uses, even residential uses near the Metro stations. Arlington's minimum parking requirement for residential uses is two to four times DC's current minimum parking requirement. Also, OP has provided no evidence that these policies actually produce more use of alternative transportation rather than merely jamming residential neighborhoods with cars so that people can rarely park in front of their homes.

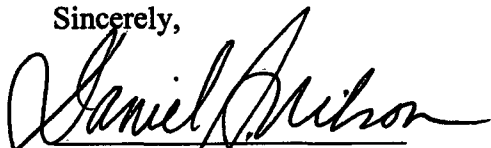
My July 28 letter includes a chart and table comparing DC's current minimum parking requirements for residential uses with those of other jurisdictions that OP has cited. Since none of the cities listed in OP's report have adopted policies as radical as OP's proposal, it is difficult to see how this can be considered "best practices." Also, to the extent that those cities have adopted even a limited elimination of some minimum parking requirements, OP has presented no evaluation of those programs to show that the policy had the desired effect.

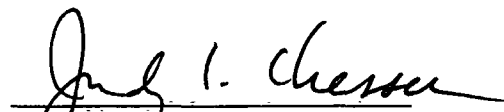
There has been no showing by OP that DC's minimums are too high. In fact, for residential uses, DC's current regulations set the minimum parking requirements well below the current level of vehicle ownership per household in DC. Thus, you could say there already is a shortage of parking.

If developers do not provide adequate off-street parking in new developments, residents will use on-street parking. The subway may be good for getting to work downtown but for many residents it does not provide efficient transportation. Not to mention trips with children, dogs, groceries and the like where mass transit is sometimes but not always adequate.

Finally, far more detailed information should be provided by OP not only about the issues raised above but also, if you do decide to move forward despite these flaws, the OP must provide actual numbers for any maximums and clear justifications for choosing those numbers..

Sincerely,

  
Daniel S. Wilson

  
Judy L. Chesser