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August 21, 2008

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

ZONING COMMISSION
District of Columbia

CASE NO. 08-06-2

EXHIBIT NO. 69

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BY FAX (202-727-6072)

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

Dear Mr. Hood:

I am writing to the Zoning Commission to express my concern about the proposed change in the Zoning regulations, noted above.

I have been following with interest the recent discussion of this proposal in The Northwest Current. I have also read the Memorandum dated July 15, 2008, from the Office of Planning ("OP") to the Zoning Commission; this Memorandum is found online at

<https://www.communicationsmgr.com/projects/1355/docs/OP%20Parking%20Report.pdf>

As you know, OP's Recommendation 1, which generally indicates that "minimum parking standards should be removed from the parking schedule," has attracted a great deal of attention. The related Recommendation 2, that "The regulations should apply parking maximums as a general rule," also is controversial.

It is interesting that OP's consultant based its recommendation "that an approach of minimum and maximum parking limits should be explored" in part on "The tendency of some developers to 'over-park' projects as a concession to neighborhood concern about spillover" (see Page 3 of the Memorandum). As a resident of a D.C. neighborhood, I find it a bit perverse that neighbors affected by development projects are to have less protection from the Zoning Regulations in the future because citizens have expressed concerns about parking spillover in the past. This approach seems to me to reflect a fundamental distrust for the role of our city's most affected citizens in the process of give-and-take that typically – and appropriately – characterizes development in the District.

Another interesting comment, made by the author of the Memorandum on Page 4, is that "If the parking regulations were revised to capitalize on the District's urban qualities, new development would follow a less auto-dependant pattern and add to the character of the existing and new neighborhoods of the future." This analysis is valid, of course, but only to a limited extent because the District's "urban qualities" vary

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widely from one part of the city to another. In addition, the availability of effective public transportation (Metro and Metrobus) varies widely from one part of the city to another.

For example, Wesley Heights, where I live, could well be characterized as more suburban than urban. Similarly, the adjacent Palisades neighborhood offers the advantages of city living (close access to the urban core and its amenities) combined with a suburban feel and its own highly-valued "downtown" of the type that pre-dates the era of massive shopping-malls. Both neighborhoods are sparsely served by Metrobus and not at all served by Metro.

I would ask the Zoning Commission this: what is there to guarantee that new development in these areas "would follow a less auto-dependant pattern" if parking minimums were eliminated? Please come to the 4800 block of MacArthur Boulevard, NW, in the evening to see the parking impact in the neighborhood of the popular new restaurant called "Black Salt." Since they opened, instead of wide-open parking all night long, almost all the nearby parking is fully utilized. A very small amount of parking belongs to the building in question, which houses several businesses and offers a small rooftop parking deck. If a new development of some kind should ever be proposed for that block, there would be no "left over" parking to share with the new use. In that case, wouldn't it make sense to consider some provision for parking in a part of the city that patrons are unlikely to access *except* by automobile?

I found it interesting that the Memorandum notes (on Pages 12-13) that "The changes would serve in the short term to lessen a large number of parking-related variances where parking is difficult or impossible to provide." I genuinely value the goal of lessening the burden of zoning reviews, which would benefit not only the Office of Planning but also the hard-working members of the Zoning Commission and the Board of Zoning Adjustment, not to mention ANC commissioners and even project applicants. However, it strikes me that the resultant reduction in the opportunity for public input may be a high price to pay.

In the final analysis, I remain uneasy about what may turn out to be a "one size fits all approach" to this important issue of providing sufficient parking for new development. For that reason, I urge the Zoning Commission to carefully weigh the concerns raised by ANC 3D through the testimony of Commissioner Alma Gates, see

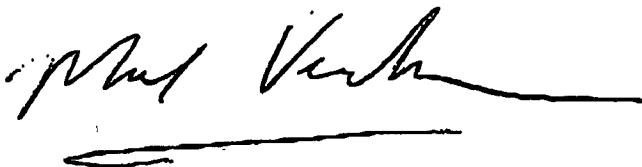
<http://anc3d.org/testimony.htm>

and the comments of Commissioner Ann Haas, see

<http://anc3d.org/comments.htm>

Thank you for your consideration.

Sincerely,



Cc: ANC3D

FAX COVER SHEET

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Date: August 21, 2008

Number of Pages (including this Cover Sheet): 3

**Please see the attached comment letter regarding Zoning Commission Case 08-06-2,
"Proposed Amendments to the Parking Regulations 11 DCMR."**

Thank you.

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