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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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Post-Hearing Filing 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

This supplements the written and oral testimony of July 31, 2008 on behalf of the Federation of Citizens Associations of the District of Columbia and its 50 member organizations from across the City.

Process. The Federation has delayed filing these comments until the last day in the hope that it would be able to see the Office of Planning's responses to the testimony and comments of July 31 as well as to the questions raised by the Zoning Commission. We believe that it is necessary and proper for this Commission to allow another round of comments on the proposals of OP before meeting to discuss and consider how to direct OP with respect to the next step in this process. This is doubly true because this is the first hearing in the zoning revision process and will set a precedent for how future provisions are considered.

For example, we do not know whether OP will continue to insist that many other cities have done away with parking minimums and have suffered no consequences as a result of

ZONING COMMISSION
District of Columbia

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that action. Although it was demonstrated at the July 31 hearing that OP is wrong in its assessment, mostly because it has not bothered to try to gather or analyze any data, the comments filed this week by the Friendship Neighborhood Association and Marilyn Simon demonstrate in excruciating detail just how wrong OP is in its assertions. If nothing else, OP should be required to respond to this assessment before it asks the Zoning Commission to consider its proposal.

In addition, we do not know what changes or modifications OP will make to its proposal. Therefore there is the danger that this Commission will be considering OP's recommendations without any public input on the current proposal. The dangers in this approach are readily apparent. We agree in large part with the testimony of Steve Sher which contained a critique of many provisions and suggestions for their amendment or deletion. We endorse his conclusions, in particular the notion of not fixing things which are not broken.

The inconsistency and illogic of OP's proposal. As we stated at the July 31 hearing, we can find no factual support for OP's position that parking minimums need to be eliminated and that parking maximums should be imposed at low levels. The only "proof" offered for these radical conclusions were that we need to make Washington a more walkable city and to reduce dependency on the automobile. Yet Ms. Tregoning testified that DC is "incredibly walkable" (Tr. 11) and number two in walkability in the US. And unless we find a spare \$50 billion or so, we will never replace New York City in walkability because we cannot duplicate its subway system. She testified that "we are the leader in things that reduce congestion and that increase livability." (Tr. 12). While noting the traffic congestion that snarls the suburbs, she pointed out that "fully 50 percent of our citizens commute by something other than vehicles, which is pretty astonishing." (Tr. 14). She noted that DC is number 7 of the top 40 US cities on the so-called Walkscore that measures how convenient different neighborhoods

are, and that many of our neighborhoods score 98 and 99 out of 100 on that scale (Tr. 19-20). Most of the comments offered in support of OP's proposal praised how walkable DC is right now.

With all of this evidence that DC is pedestrian and bicycle friendly beyond what anyone might expect, we then hear that DC is condemned to a future tied to the automobile because we have parking minimums. This is a complete *non sequitor*. If minimums are so pedestrian unfriendly how did we get to where we are? How will eliminating minimums make us more pedestrian friendly? All that OP points to are the elimination of minimums in certain parts of some cities that have minimums far in excess of DC's in their residential neighborhoods. As Mr. Sher said, if it ain't broke, don't fix it – especially when the fix is more designed to follow the desire to be “out front” on this issue than to solve a real problem.

Spillover. We join in the comments of the Friendship Neighborhood Association. OP has not done the research that is necessary to support its conclusions

The OP proposal runs contrary to the Comprehensive Plan. 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 does not say eliminate parking, nor do any of the other Comp Plan sections cited at page 5 of OP's July 15 report.

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? 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?

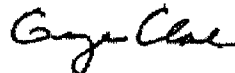
The argument of one family. We heard at the hearing from the Speck family. While we admire their goals and fortitude, is one family, with one newborn representative of the young families in our City? We are supposed to gamble that the young families moving into the city and helping to revitalize many of our neighborhoods will want to stay if they can’t have a car to buy diapers in bulk or go to day care when they have that second child, 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? And as the Committee of 100 points out (and we second its comments), the application to build on a 500 sq. foot lot required relief from more than parking requirements.

And let’s be clear about one thing. The Federation (and the Committee of 100) has long argued that OP’s policies are anti-family, emphasizing growth among singles and those without children who pay taxes but have little call on City services. These proposals, with the litany of supporters who have no families, many of whom are well-intentioned but new to the

City, do not show any real concern for the issues facing families. Our members are raising and have raised families in the City. Their experience is worth something.

Neighborhood inequities. We await OP's analysis on poorer and underserved neighborhoods. This alone is reason to have another round of comments and a further public hearing before directing OP to do anything.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "George Clark", written in a cursive style.

George R. Clark

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