

ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA

CASE NO. 08-06-2

COMPREHENSIVE ZONING REGULATIONS REWRITE: PARKING

Additionally Submitted Testimony after the Hearing

Testimony of Bill Crews, DC resident

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I am Bill Crews, a resident of the Capitol Hill neighborhood in the District and a former Advisory Neighborhood Commissioner for SMD 6C07 as well as a former Zoning Administrator for the District of Columbia. I submit this additional testimony on behalf of an organization called SAVE DC ZONING.

First, I ask the Commission to clarify just exactly what is 'on the table' right now. The Public Notice had suggested draft regulation language, rather rough, but language none the less. The Office of Planning (OP) Memo dated July 15, 2008, to the Commission on page 1, paragraph 3 states that OP anticipates parking as a "stand alone chapter". Yet the hearing did not address regulation language, but the 11 policy recommendations. I simply ask the Commission to further clarify this procedural issue.

I also note that the public has not had a timely opportunity to comment on the additional work the Commission requested of OP and the District Department of Transportation (DDOT) at the hearing.

Second, I again refer the Commission to my submitted written testimony for the July 31, 2008, hearing. My three main points were:

- People do depend upon the zoning regulations to control development, uses and impacts that negatively reflect upon their property values. Good zoning provides some certainty and limits external forces and uses impacts on residents' property. Good zoning helps protect property values and quality of life within our neighborhoods.
- The proposed conceptual revision removing minimum parking requirements also relies directly on better on-street parking management, yet there is no legal nexus between the zoning regulations and on-street parking management. The District Department of Transportation Public Space Management staff is working hard to improve on-street parking management, but there is no legally enforceable coordination or reliance in place to ensure existing residents that the two will work together successfully and not increase the already overwhelming demand for on-street parking in many neighborhoods - especially in those cherished neighborhoods within the L'Enfant Plan, like my own, where triangle blocks have historically reduced the ability to provide off-street parking for residents.

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- Recommendation 1 recognizes the problems with the “spillover effects” of no parking minimums on “single-family and rowhouse zones”. This is a very crucial recognition and I appreciate and support these exceptions to ‘no minimums’. However the specific uses listed to trigger the exceptions **do not** include multi-family residential uses whether in the ‘single family and rowhouse areas’ or “in commercial corridors near” such areas. I repeatedly tried to make this point and requested OP to include multi-family buildings in this ‘carve-out’ for no minimum requirements during work group and task force meetings, but to no apparent avail. Multi-family uses without some required off-street parking can have as much, if not greater impact, as “non-residential uses” listed in sub-number “1.” or “Retail, Office, Restaurant or Services” in sub-number “2.”.

I appreciate the opportunity to provide the following additional comments.

- Low to moderate density residential areas (Zoning Districts R-1 – R-5-B) should require off-street parking if the lot has alley access or a street frontage of 40 feet or more. This is designed to minimize curb cuts, yet still reduce on-street parking demands. This off street parking can also help provide open spaces and environmental benefits, especially if permeable pavers are used to reduce stormwater runoff. The public has not seen what OP is recommending for the Low to Moderate Density Residential topic, but there has been comments about getting rid of rear and side yard requirements – a very scary prospect for a green city. Requiring a parking space may help save green, open spaces.
- If the commission is considering only ‘policy recommendations’ with the intent of providing OP with policy concepts that then would be included in draft regulatory language, additional attention needs to be placed to the existing parking language in Title 11. This is especially true, because even with all the impression that OP is doing away with parking minimums, OP is NOT recommending doing away with all parking minimums. Parking ‘requirements’, not just the number of spaces, the size, the driveways and aisles (not now considered the same), angles, groups, stacked, shared and other details need to be proposed, addressed, and considered.

Following the goal of making the regulations easier to administer, there should be a section by section analysis of every parking regulation in Title 11 with an indication if it goes or if it stays. Specifically Section 2118 of Title 11 is very difficult to administer. Will there still be two different standards for ‘required’ parking spaces and for ‘all’ parking spaces, and, if so, will the proposed language be clear as to which is which? What stays and what goes? It would be extremely helpful if OP would provide an annotated list for the current regulations.

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- The Commission should realize that contrary to the appearance from the July 31 Hearing of this debate being black and white, there is in fact, like most public policy issues, many shades of gray. Even though the OP recommendations do not completely do away with parking minimum requirements, it would be hard to realize that based upon most of the testimony. Even OP Director Tregoning statement beginning on page 11, line 19 of the July 31 Hearing transcript uses ‘gray’ qualifiers while appearing to support doing away with parking minimums: “We have the places to go to where we can meet our daily needs as citizens without having to *necessarily* get in a vehicle or even *in some cases* leave our neighborhoods.”

For reasons of health, safety, time, and individual liberty, personal vehicles will be desired and/or required by many families. The new zoning regulations should acknowledge this right and not completely leave management of this vital aspect of our quality of life to ‘market forces’.

- As mentioned in my testimony submitted at the hearing, we wait for a better connection between OP and DDOT as well as the Department of Public Works and the Office of the Zoning Administrator to coordinate parking management and enforcement. Also, there needs to be a clear statement that most of our traffic congestion and parking demands are commuter based and the desire and need of individual District households for personal vehicles should not be the scapegoat for causing congestion.
- I concur in the additional testimony submitted by Ms Marilyn Simon of the Friendship Neighborhood Association and Ms Barbara Zartman of the Committee of 100 and encourage you to carefully consider their analysis and recommendations.
- I also urge you to allow additional comment by the public once OP and DDOT make available the additional information and work you requested of them at the July 31 hearing before you vote on any policy direction to OP.

I appreciate your consideration of this additional testimony.

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