



CAPITOL HILL RESTORATION SOCIETY

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October 23, 2008

Jerrily R. Kress
Director
Office of Zoning
441 4th Street NW, Room 210 South
Washington DC 20001

Re: Draft Parking Regulations, ZC Case # 08-06-2

Dear Director Kress:

At its board meeting on October 21, 2008, the Capitol Hill Restoration Society voted to support the position of ANC 6B regarding the draft planning office proposals for parking limits in the new zoning code.

The ANC's position is spelled out in the attached testimony of Dave Garrison, commissioner of ANC 6B01.

Thank you for considering our comments.

Sincerely,

Richard N. Wolf
President

cc: Sharon Schellin, Secretary to the Zoning Commission
Travis Parker, OP Zoning Review Manager
Dave Garrison, ANC 6B01 Commissioner

ZONING COMMISSION
District of Columbia

ASE NO. 08-06-2

EXHIBIT NO. 90

ZONING COMMISSION
District of Columbia
CASE NO.08-06-2
EXHIBIT NO.90



**David F. Garrison
Commissioner
ANC 6B01**

**Testimony before the DC Zoning Commission
ZC Case #08-06-2, Parking**

July 31, 2008

Mr. Chairman and members of the Commission.

I am David Garrison, Commissioner for ANC 6B01 and Vice Chairperson of ANC 6B's Planning and Zoning Committee. I appear here this evening with my colleague, Ken Jarboe, to provide ANC 6B's comments on text amendment #08-06-2 regarding parking.

We have a variety of concerns about the parking proposal before you, in particular as regards the suggestion that we should dispense with minimum parking requirements. We realize that you and the Office of Planning hope that by bringing individual topics such as this forward for focused discussion, you will be able to manage your overall process of implementing the Comprehensive Plan Update in an orderly and thoughtful way. Nonetheless, at least as regards the topic of parking, it is difficult to assess the viability and logic of this proposal out of context as it is with proposals to implement other aspects of the Comp Plan.

Beyond that, your Commission surely would want to know what the city was willing to do on a range of related policy decisions regarding parking rules and incentives such as those overseen by DDOT and DPW. In our considered view, decisions about how the zoning code should address parking must be made as part of the larger fabric of decisions about goals for the city's neighborhoods.

To begin, though, what does the Comp Plan Update, in Chapter 2 on Land Use, call for?

Policy LU-2.1.11: Residential Parking Requirements

Ensure that parking requirements for residential buildings are responsive to the varying levels of demand associated with different unit types, unit sizes, and unit locations (including proximity to transit). Parking should be accommodated in a manner that maintains an attractive environment at the street level and minimizes interference with traffic flow. Reductions in parking may be considered where transportation demand management measures are implemented and a reduction in demand can be clearly demonstrated.

It is not clear to us that this Comp Plan section supports the recommendation before you. Rather, the sort of major policy change envisioned in the proposal to eliminate minimum parking requirements – one that would surely result in increased competition for an already very scarce resource by all residents – moves well beyond what is required to implement the Comp Plan.

In order to achieve the proper balance sought by the Comp Plan, the city needs to consider the full range of government decisions impacting access by cars to our neighborhoods, including such critical regulatory systems as the Residential Parking Permit program. If, as proposed here, the zoning code were to permit residential projects that had little or no on-site parking without the city also taking action to restrict the ability of new residents of such projects to get on-street parking permits, the result would simply be less on-street parking options for all residents.

In many of our Capitol Hill neighborhoods, we long since reached the point where demand exceeds the supply of on-street parking spaces. And for those living in townhouses on blocks with no interior alleys and thus no off-street parking areas, parking one's car on the street is the only option. In fact, many Hill residents have already reduced their car ownership to the bare minimum, an accommodation surely to be praised. Introducing more demand into these neighborhoods while supply remains constant would fundamentally and detrimentally affect our ability to access and use our homes.

It isn't clear that people who are attracted to already walkable places like Capitol Hill want to abandon their ability to have a car. It appears to us that our residents want to do both – be able to access the nearby amenities by walking and at the same time have the option of driving to other areas of the city and region. And since we have on-street space for residents to park near their homes, we would vastly prefer to use those spaces for residents than for some other use such as for commuters or tourists. Indeed, if the city wants to reduce the number of cars on city streets, it should focus on the far larger problem presented by commuters.

We can see how it might make sense to use a tiered pricing policy to discourage multiple car ownership among residents and to encourage full use of off-street parking resources, including garages, in residential areas. But we do not think it wise or effective to attempt to reduce car ownership outright among existing residents by either reducing the supply of parking spaces and/or increasing the demand for parking without increasing supply.

We support efforts by the city to reduce dependence upon automobiles, especially in areas adjacent to major bus and transit nodes. However, we do not support approaches that would result in significantly reduced neighborhood parking options for existing residents. Until all elements of the city are able to come together around a coordinated set of decisions on parking, we ask the Zoning Commission to withhold action on this proposal.

My colleague, Ken Jarboe, will discuss our comments on the other aspects of the proposal before you this evening. Thank you for your attention.