



COALITION FOR SMARTER GROWTH

May 21, 2009

Mr. Anthony Hood, Chairman
Zoning Commission of the District of Columbia
One Judiciary Square
441 4th Street NW, Suite 210 South
Washington, DC 20001

RE: SUPPORT for Case No. 08-06-9: Office of Planning -- ZRR: Sustainability

Dear Chairman Hood and members of the Commission:

Please accept these comments on behalf of the Coalition for Smarter Growth, a regional organization based in the District of Columbia focused on ensuring transportation and development decisions are made with genuine community involvement and accommodate growth while revitalizing communities, providing more housing and travel choices, and conserving our natural and historic areas.

Overall, I want to commend DC Office of Planning for creating a sustainability section as part of the review and revision of the zoning code. We appreciate how this analysis has provided insight into how our zoning code can encourage more sustainable patterns of living and building. We support the report's recommendations regarding energy efficiency, renewable energy production, water and sensitive resource protection, food security, green jobs and large area development. We fully support establishing LEED-ND standards for large tract review. We would like to focus our comments on the first area addressed in the report: integrating land use and mobility.

Approximately one-third of our country's greenhouse gas emissions are from transportation. Thus, taking advantage of the efficiencies of a compact city like D.C. and providing more people with the opportunity to travel by zero or low emissions modes should be reinforced in our zoning code. The first set of recommendations address this -- Transportation Demand Management, Accessory Dwelling Units, and Transit-Oriented Development.

1. Transportation Demand Management (TDM):

We support requiring TDM measures for large buildings. TDM measures are the perfect complement to reduced private vehicle parking. The combination of TDM measures and less individual vehicle parking will reduce the traffic generated by new development while increasing mobility for new occupants and the attractiveness of the building. This is a win for everyone. We ask that the requirements established be aggressive enough to reduce private vehicle parking and provide a robust TDM program for building occupants.

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We ask that unbundling the cost of parking spaces from renting or buying a housing unit be a part of the TDM program. Regarding parking in commercial buildings, rental of parking should be required to be separate from leases for commercial space, rather than bundled into a lease. This helps the user pay for only the parking he or she wants, rather than forcing everyone to subsidize parking. Coupled with incentives like transit passes, carsharing and bicycle parking and showers, more employees will want to ride transit, walk or bicycle to work.

Facilities to support bicycling to work are not mentioned in this list. A shower and changing facilities are a key component to encouraging employees to bicycle to work. We want to ensure that shower and changing facilities are part of new building requirements for TDM or are in the bicycle parking section of the zoning code.

We ask that a TMD requirement encourage shared parking with nearby uses as a way to reduce the overall investment made in parking and to more efficiently use spaces rather than build new ones for each adjacent separate use.

The city comes late to establishing a robust TDM program, but we welcome the current opportunity. We ask that the program set aggressive standards, taking full advantage of our public investment in transit, walking and bicycling facilities. A large share of our city's traffic is generated by subsidized parking which incentivizes people to drive. We need to reverse the incentives, and start encouraging more community and environmentally-friendly travel. This doesn't in any way preclude those who need to drive from driving, but they will not receive such generous subsidies anymore. By implementing an effective TDM program, those who need to drive will find they have less traffic congestion to contend with. But for many, the switch from driving or owning a car is a matter of a few simple incentives in a different direction.

2. Accessory Dwelling Units (ADUs):

We have long been strong proponents of encouraging more ADUs. We strongly support this recommendation. ADUs provide many benefits to our city. For low income people, ADUs offer more affordable housing opportunities, possibly in a neighborhood close to work or Metro. Many expensive neighborhoods close to Metro have limited housing opportunities for small working families and individuals. ADUs provide new opportunities to meet a variety of housing needs in existing communities. For homeowners, such as older couples with grown children, ADUs enable them to stay in their homes, while getting help with the mortgage and even help around the yard. For a first time buyer, a legal ADU might make the difference in qualifying for a home loan.

ADUs provide for new, more affordable housing opportunities that can be seamlessly integrated into existing neighborhoods. The OP report points out that declining household sizes mean fewer people to shop at local stores. ADUs are an elegant solution to maintaining the historic population levels of neighborhoods without changing the look of the neighborhood. It's a good approach to adapting an older housing stock to a new demographic context. We strongly support easing restrictions on ADUs so that the permitting is a clear, easy-to-follow administrative process. Easing the permitting process will also

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improve safety by bringing in many unpermitted units so that they are inspected and meet health and safety standards. We also ask that onerous requirements such as minimum parking requirements not be imposed on such units. Where competition for free street parking in low density neighborhoods exists, it is not due to residents, but rather from outside users. Management of street parking should be managed by DDOT, to address car owners' concerns. This is a separate issue from meeting more our city's housing needs and improved access to transit.

3. Transit-Oriented Development (TOD)

We support creating TOD districts and establishing standards to enhance the pedestrian environment through regulating building form and minimum mix of uses. Minimum development levels – above surrounding densities should be encouraged near major transit nodes. The pedestrian environment should always be protected through building form regulations such as the prohibition of surface parking, restriction of garage entrances, requirements for pedestrian entrances, transparent windows, parking maximums (particularly around Metro stations). The regulations should establish that these transit nodes are the place where more housing and commercial space should be encouraged.

Thank you for your consideration.

Sincerely,



Cheryl Cort
Policy Director