

September 20, 2015

Comments on ZRR Case No. 08-06A – Proposed Title 11 DCMR-Zoning  
To: DC Zoning Commission

Having lived in Ward 3 with my family for over 16 years, I am deeply rooted in the community (I ran for ANC last year) and care very much about the future of our city. Consequently, I am very concerned and upset about the proposed text for the revising of DC Zoning Changes, regarding the reduction of minimum parking requirements citywide - it flagrantly does not comport with DC's legally binding Comprehensive Plan which mandates that zoning policy and decision-making be based upon data. Many other citizens share the same disbelief. The decision to reduce parking requirements is not based on the level of demand for residential parking in various Ward 3 neighborhoods and will increase, rather than diminish the traffic. In the area of Friendship Heights, which is where I live, judging from all of the census data on vehicle ownership, the number of spaces that developers are currently required to provide should be, at the very least, maintained. Following are remarks that were made by other neighbors (they appeared on the Chevy Chase Listserv). I am submitting these comments as they very succinctly and accurately express and illustrate why there is a need for the Zoning Commission to revisit its decision.

**The more people walk or bike (or take public transit), the longer their cars spend parked at or near their home. Which is why onsite residential parking provision is so important -- especially in mixed use transit accessible areas like ours where residents are multi-modal and where non-residents need on street parking access to shop, work, take Metro, go to the playground, etc. If residents of new multifamily buildings lack onsite parking and end up using the streets for long-term storage of their cars, everybody loses. That's why we need onsite parking requirements that are roughly commensurate with car ownership rates. Then residents' cars can be parked off the street (typically underground), freeing up curb and road space for other users and uses.**

That many households will continue to own cars despite the fact that their members are also frequent walkers, avid cyclists, and/or daily public transit users is not simply an article of faith. There is strong and consistent statistical evidence that this is the case in DC. The ratio of vehicles to households has remained remarkably constant over the past 25 years (averaging .9 cars per household overall, 1.3 for owner-occupied households and .6 per renter-occupied households). And, as DC's population has increased in recent years, so has the number of vehicles registered in the District. (In fact, according to MWCOC's most recent vehicle census (2014), registrations in DC rose at a rate that was twice the regional average over the past three years (5.8% vs. 2.9%)).

By contrast, there is no empirical basis for the Office of Planning's assumption that fewer than one in six households in every new multifamily building within half a mile of a Metro station (or ¼ mile of a major bus route) will own a car and none will own more than one car...even in DC census tracts near transit where multifamily buildings predominate, car-ownership rates are significantly higher than that. Long story short, the regulations being proposed are based on wishful thinking – not empirical observation. And it's also worth remembering that, even under the current regulations, building-specific waivers of or reductions in on-site parking requirements can be (and have been) granted.

Re the notion of "induced demand." The premise is that free (or cheap) and convenient parking induces people to drive to destinations that provide it. And the corollary is that if

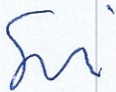
such parking were eliminated (made scarce and expensive) then fewer people would drive to these locations. In some contexts (e.g. employment), the result would be mode shift – rather than driving alone, people might carpool, walk, bike, or take transit if these options were available to them. The fact that employees have to get to work and that they typically go to the same workplace on a regular schedule makes these kinds of mode shifts more likely and they can be further induced by employer subsidies (e.g. Smart Benefits). To me, this is a good argument for locating workplaces near Metro.

But note that this scenario says nothing about car ownership (just about how people decide when and where to drive). Nor does it consider where parking demand shifts to when driving to work becomes a less desirable option. Those cars that are no longer being driven straight to the office are left parked at home (or in a cheaper lot a bit farther away from work or within walking distance of a Metro stop). They don't vanish into thin air. Finally, remember that the on-site parking built in the context of new residential projects in DC is not free. Car-owners pay a substantial monthly fee for garage space. The local market has already imposed a significant financial disincentive with regard to car ownership. And our lower car ownership rates (compared to local suburban jurisdictions) reflect that. No one is arguing that car ownership is or will be universal in DC -- the current regs assume that no more than half of the households in an apartment building will own a vehicle (that figure drops to a third or a quarter in areas closer to downtown or along major Avenues).

When planners in New York City and Portland, Oregon (in response to just the sort of debates we're having) investigated whether the absence of on-site residential parking leads households with good access to public transit to forego car-ownership, the answer was a clear no in both cases. Car-ownership is a function of a host of other factors (e.g. affluence, household size, presence of children, location of workplace(s)).

As to other uses/users of scarce road space, the trade-offs here aren't just between bike lanes and curbside parking. Food trucks, loading zones, traffic-calming features like bulbouts, rush hour travel lanes, turn lanes, CaBi stations, bus stops and streetcar platforms, and car share spaces are examples of the other kinds of uses competing for road space. In this context, removing the requirement that developers provide onsite residential parking at multifamily buildings (or slashing it to a level that, predictably, means that most residential demand will be unmet) makes no sense. We need to continue to provide off-street parking alternatives for new residents.

Thank you for your consideration.



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