

4911 Ashby Street, NW  
Washington, DC 20007

November 14, 2013

DC Zoning Commission  
441 4<sup>th</sup> Street, NW  
Suite 220 - S  
Washington, DC 20001

RE: ZC Case No. 08-06A  
Subtitle X, General Procedures  
Private School Parking

Members of the Zoning Commission:

At the November 4, 2013 hearing on Subtitle X, my testimony contained the following statement and recommendation:

A major issue faced by private schools is faculty/staff parking. While Subtitle X §101.8 (b) requires the location of parking facilities, the actual formula for numbers of spaces is found in a different Subtitle (C-1901.5). The new private school parking formula was hotly contested by the task force but objections fell on deaf ears. It is unreasonable for OP to change the basis of the parking formula until it can demonstrate there is a need for change, and the change will not result in an “objectionable condition.”

**Recommendation:** Retain current parking formulas for private schools and reference them in Subtitle X. Student driving and parking policies should be clearly outlined in the school’s operations manual and made a condition of special exception approval.

Commissioner Miller asked for a comparison of the existing and proposed methods of calculating parking requirements for private schools, and suggested campus GFA could be found by looking through BZA Orders. After searching through several private school zoning orders to no avail, I contacted Allison Prince, the zoning attorney for both The Lab School of Washington (LSW) and St. Patrick’s

Episcopal Day School. Ms. Prince's response was that GFA is not something normally calculated for private schools but an ANC Commissioner had requested GFA recently in connection with a pending LSW zoning application. Regarding St. Patrick's, Ms. Prince noted, "I don't have GFA information for St. Pat's since it is not required in connection with BZA applications. It would be hard to pull together since I have very little info on the main building."

Given the lack of information available on private school GFA, this may be the appropriate time for the Zoning Commission to ask the Office of Planning to furnish the basis for its recommendation to change current the 11 DCMR 2101 parking formula; and, to provide the GFA used to calculate the proposed parking requirements for private schools with existing BZA Orders. A side-by-side comparison of the existing and proposed parking requirements would enable the Commission to determine whether or not this change would have a negative impact on the neighborhood surrounding the school.

The following provides considerably more information than the Commission requested, however the LSW example puts actual private school parking needs in perspective relative to what is being proposed.

The current parking requirement under 11 DCMR 2101 for The Lab School is based on the following:

LSW Employees: 182  
Required parking spaces: 130<sup>1</sup>  
Spaces provided: 107

The proposed parking requirement using the ZRR formula based on GFA:

GFA of LSW: 85,000 sq. ft.  
ZRR Parking formula: 1.25 per 1000 sq. ft. of GFA  
Required parking spaces: 106

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<sup>1</sup> Application No. 17383-A of The Lab School of Washington, approved February 12, 2007, page 11. "Based upon the School's figure of 182 employees, under the parking schedule set forth in 11 DCMR 2101, the School is required to provide 130 spaces on site. The Board finds that a reduction in this requirement is justified, reducing that number to 107 spaces on site, including unmarked spaces and stacked parking. This reduction is less than the 25% authorized under Section 2108.3 which in this case would allow a reduction in the required number of spaces to 98.

As BZA Order No. 17383-A indicates, the current 107 parking spaces provided by LSW represent about a 25 percent reduction from the required 130 spaces; but, LSW can only provide 87 parking spaces that meet the technical specifications of the regulations.<sup>2</sup>

As shown above, the proposed private school ZRR parking formula (1.25 spaces per 1,000 sq. ft. of GFA) would require LSW to provide 106 parking spaces. The difference between what is currently required (130) and what is proposed (106) would be 24 fewer on-site parking spaces.

When the LSW application came before the BZA, DDOT noted the school's parking demand far exceeded its available supply. As a mitigation measure, LSW constructed 43 angled parking spaces on Whitehaven Parkway.<sup>3</sup> These spaces do not count towards the schools parking requirement, but are meant to mitigate the potential for spill-over parking on neighborhood streets. The construction of angled spaces demonstrates the need of the school for more, rather than less, parking for staff, visitors and students. The school also leases spaces from CVS for staff. Even the 11 DCMR 2101 parking formula does not meet the parking demand of the school; and, the school has attempted to control its parking demand through means other than on-site parking.

Actual LSW parking needs: 175 spaces

On site: 107 spaces

Off site: 43 angled spaces

25 leased spaces

Proposed GFA spaces: 106 spaces

Actual vs. Proposed: 69 fewer proposed spaces

Based on the facts provided above, the proposed ZRR GFA parking formula would reduce the number of required on-site parking spaces significantly and likely

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<sup>2</sup> While the Applicant has only 87 parking spaces that meet the technical specifications of the regulations, the Board concludes that the words in Section 206, "but not less than that required in Chapter 21," modifying the phrase "ample parking," applies to the number of spaces required on site by the parking schedule. Accordingly, the Board applies the special exception standards in its evaluation of other parking space criteria.

<sup>3</sup> Application No. 17383-A of The Lab School of Washington, approved February 12, 2007, page 3. DDOT submitted a report noting that the School's parking demand far exceeded the available supply, and that the school needs to mitigate the use of parking in the neighborhood...[He] supported the creation of the angled parking spaces, provided they were available to the public and not dedicated to the exclusive use of the school.

reverse years of ANC and community involvement in private school zoning cases. The current parking formula, 11 DCMR 2101, provides greater assurance parking demand by private schools will not become an objectionable condition for residential areas adjacent to private schools. That is not the case when the ZRR proposal based on GFA is applied. For this reason it was recommended in testimony presented on Subtitle X that the parking formula found in 11 DCMR 2101 should be retained as the basis for determining private school parking.

Sincerely,

A handwritten signature in black ink that reads "Alma H. Gates". The signature is written in a cursive, flowing style.

Alma H. Gates  
Administrator  
Neighbors United Trust