



Coalition for Smarter Growth

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Testimony before the DC Zoning Commission

RE: Zoning Commission Case No. 08-06A (Alternative Language to Certain Advertised Text – Title 11, Zoning Regulations – Comprehensive Text Revisions) setdown for hearings September 8-11, 2014; comments pertaining to Subtitles C, D, I, G, J & K

By Cheryl Cort, Policy Director
September 8, 2014

Please accept these comments on behalf of the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization in the Washington, D.C. region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We again want to thank the Zoning Commission, Zoning Office staff and the DC Office of Planning for the 7 years of hard work and extensive public outreach to revise our badly outdated zoning code. Given the surprising turn around in our city's long decline and current rapid growth, this zoning update is urgently needed. We wish to reiterate our overall support for the ZRR. Regarding the proposed changes to the language setdown in September last year, we wish to make the following comments.

Subtitle C - Vehicle Parking

We support most of the proposed changes in the hearing notice for subtitle C, but specifically want to express opposition to the DC Office of Planning proposal to: "Remove the Priority Bus Corridor from the areas within which required parking may be reduced by up to 50% as a matter of right as originally advertised." Instead, we support the alternative language: "In the Alternative: Retain the Priority Bus Corridor as an area within which required parking may be reduced by up to 50% as a matter of right, as originally setdown on September 9, 2013."

We continue to support the recognition of major bus corridors as a key transit resource that can reduce the need to rely on car ownership. Evidence of access to major bus transit as a key contributor to lower parking demand is found in the U Street NW area residential parking study we previously submitted. This study shows that proximity to Metro is not the best predictor of the lowest parking demand. Some of the lowest demand buildings in the study were farthest from a Metro station (more than half a mile) but had high walkscores and were within a block of a Bus Priority Corridor. These results point to the role that major bus routes can provide to more residents to help them save on the expense of owning and storing a car, and rely on other travel modes. Our zoning code should recognize this and support the growing market for car-lite living. Given that more DC residents ride the bus than ride Metro, why would we exclude this major form of transit from consideration of parking demand?

Select Excluded Bus Priority Corridor-served neighborhoods	Commute to work by public transportation
Stonghold (Census Tract 92.03)	44.5%
Howard University (Census Tract 35)	56.4%
Bellevue (Census Tract 98.07)	37.2%
Parkview/Georgia Ave. (Census Tract 32)	43.2%
Comparison tract: U Street NW (Census Tract 44) (served by Metrorail, a bus priority corridor)	38.3%

Source: US Census 2008-2012 ACS 5-year estimates

When we consider how parking demand and transit utilization vary across the city, we see that many neighborhoods served by bus priority corridors have high rates of transit use. The table above shows the percent of residents in a few of the neighborhoods that would be excluded from the 50% relief from parking minimums based on transit access. The table also includes for comparison the U Street Metro station neighborhood. Given the high rates of transit use – for example Stronghold has 44.5% of workers riding transit versus 38% for U Street Metro area – we ask the Zoning Commission to retain the provision that allows reductions in parking minimums in Bus Priority Corridors. The 50% reduction helps support a better approach to determining the right amount of parking based on market demand.

We oppose the OP proposed language to “require parking in the D-5 zone west of 20th Street, NW.” We support the alternative: “retain the parking standards for the D-5 zone west of 20th Street NW as originally setdown on September 9, 2013.” This area is a part of the extended downtown and has high accessibility to transit and walk and bicycle access to major destinations. The market will build extremely costly parking spaces based on demand. Overbuilding of parking spaces will be more a problem than underbuilding.

Subtitle D – Accessory Apartments

We are concerned that the modest provisions to allow accessory apartments are being further constrained with the DC Office of Planning proposal to: “Require any accessory apartment in an accessory building (i.e. detached) to be permitted as a special exception in all cases.” We urge the Zoning Commission to reject this proposal, and support the alternative language in the hearing notice: “In the Alternative: 1) Retain the matter of right provision for accessory apartments to be located in existing accessory buildings as originally setdown on September 9, 2013.” Further we support the alternative text to: “2) Delete the six person aggregate maximum for the principal and accessory apartment and establish a limit only on the number of residents in the accessory apartment.” We also support the proposed amendments to eliminate lot size, reduce minimum square feet for R-2 and R3 zones. The earlier proposal was too restrictive, as evidenced by testimony.

Dwellings in carriage houses and garages have always been a part of the fabric of our city. These detached dwellings can create wonderful places to live, offer more affordable housing options, and provide extra income for aging homeowners. The zoning update has already imposed many other restrictions on accessory apartments. A carriage house or garage that meets the standards should be allowed to offer a new housing opportunity that benefits both the many people in search of an apartment, and homeowners who can age in place if they can better use underutilized living space.

Subtitle G, J & K – Large Format Retail

We support overall the proposed text to permit large format retailers of more than 50,000 square feet through a special exception. We recognize that grocery stores are exempt from this regulation. While we are supportive of the review guidelines in general, we have some concerns regarding parking and

transportation. In particular, we recommend deleting section 206.4 “Sufficient automobile parking, but not less than that required by Subtitle C, Chapter 19, shall be provided to accommodate the employees and customers ” With a robust transportation demand management (TDM) plan, parking demand could be reduced, thus this added statement that goes beyond what is already required in the code undermines an alternative way to provide sufficient parking through reduced demand. Most likely, too much parking will be provided since big box retailers are accustomed to suburban levels of driving Secondly, we ask that the guidelines encourage the creation of a TDM plan to reduce the amount of traffic and parking demand generated by the use This would be beneficial to the surrounding neighbors with less vehicular traffic unnecessarily generated, and could reduce unnecessary impervious surface and polluted stormwater runoff.

Thank you for your consideration