



Coalition for Smarter Growth

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September 12, 2014

DC Zoning Commission
441 4th Street NW Suite 200S
Washington, DC 20001

Via email: zcsubmissions@dc.gov

Re: Zoning Case Number 08-06A, Subtitle C – Parking - supplemental comments

Please accept these comments on behalf of the Coalition for Smarter Growth (CSG). The Coalition for Smarter Growth is the leading organization working locally in the Washington, D.C. metropolitan 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 are submitting comments regarding ZC 08-06A Subtitle C – Vehicle Parking, related to two matters: (1) further support for “1 per principal dwelling when alley available” for one family dwellings requirement; and (2) evidence regarding the added cost from parking minimums that raise the price of housing and make new housing infeasible.

First, we would like to offer additional support for the proposed “1 per principal dwelling when alley available” for one family dwellings. We agree that this is a reasonable compromise between advocates who want to require off-street parking, and the many harms of a new curbcut which would remove a shared street parking space, disrupt continuous sidewalks, and degrade historic streetscapes. To require a curbcut on a public street guarantees that an on-street parking space that is currently shared by the residents and visitors of the block would be privatized for the exclusive use of an individual property. This is a net loss to the public of available street parking. The new curbcut and driveway not only negatively affect the availability of parking on the street for neighbors, but also interrupt the sidewalk with a new conflict point with pedestrians, and undermine the historic fabric of continuous sidewalks and grass panels along the street. Attachment 1 shows photographs demonstrating this point. We want to restate our support for the reasonable compromise proposal to require a parking space if an alley is available, but not force a curbcut and driveway into the public street and sidewalk if an alley is not available.

Second, we would like to offer additional evidence regarding how the added cost from parking minimums raises housing costs and discourages new housing. Attached please find a construction cost feasibility assessment submitted in support of a variance to build fewer parking spaces than the required 1 space per 2 unit ratio under current zoning (Attachment 2). The developer proposed a 1:3 parking ratio for a small apartment building located close to major transit services (local bus service, Bus Priority Corridor, future streetcar), and local amenities (grocery stores, restaurants, shops). The 1:3 ratio could be achieved by excavating one level below grade. To meet the higher 1:2 parking requirement, the project would need to excavate another level below grade, incurring significantly higher costs. The estimated cost per space is \$35,000 for one level below grade, and \$52,000 per space for 2 levels below grade. The developer determined the proposed 1:3 parking ratio would satisfy demand for parking at the building. Further, the developer determined that future tenants would not be willing to pay for the additional cost

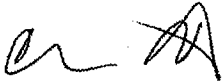
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District of Columbia
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of the additional spaces required by the zoning code. To offset these added costs, rents would need to be raised by \$168/unit for each of the 45 units in the building to recoup the loss. Given these costs, the developer determined that the added costs would make the project infeasible. We note that the 45-unit project planned to provide 3 Inclusionary Zoning units at 50% of AMI and 3 units at 80% AMI. Thus the high cost of the parking requirements are raising housing prices, constricting housing supply, and reducing the number of affordable units that could otherwise be built in a highly accessible neighborhood. Given this evidence, we reiterate our support for the reduction of parking minimums to 1:3 for multifamily housing, and a 50% reduction in areas within ¼ mile of Bus Priority Corridors, streetcar, and ½ mile of Metrorail stations.

Thank you for your consideration.

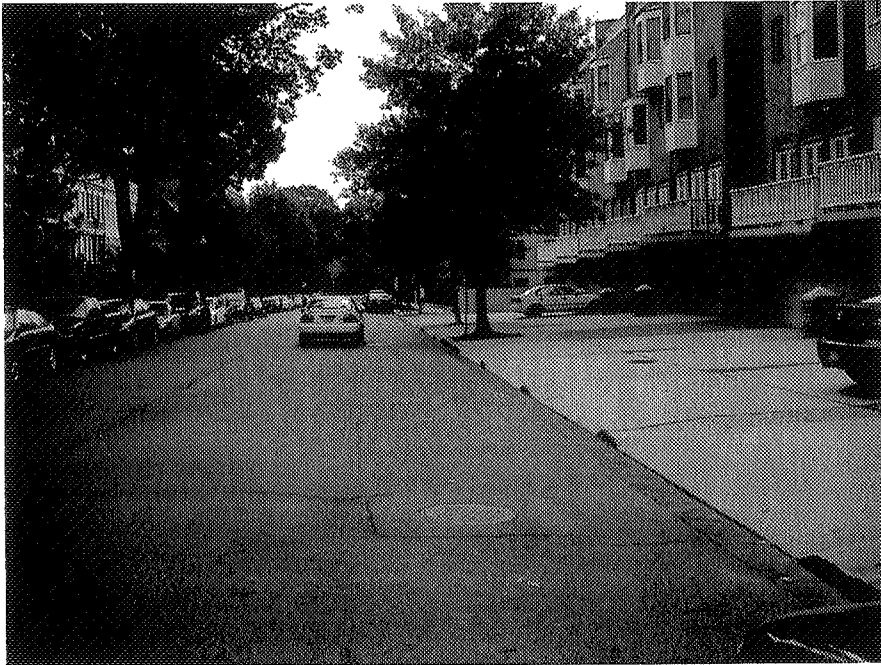
Sincerely,

A handwritten signature in black ink, appearing to read 'Cheryl Cort', followed by a stylized flourish or mark.

Cheryl Cort
Policy Director

Attachments

Attachment 1



2100 block of O Street eliminates street parking and adds driveways that are out of character with this historic rowhouse neighborhood.



1400 block of W Street NW – this vacant lot has not alley access. Replacement of the missing housing would require a curbcut and driveway on a block where none of the circa 1900s rowhouses have curbcuts, driveways or garages. Forty-nine percent of households in this Census Tract own no vehicle.



March 25, 2014

Mr. Dan Roth
Ditto Residential
2217 14th Street NW, Third Floor
Washington, DC 20009

RE: 1326 Florida Ave NE, Washington, DC 20002 - P2 Level Construction Feasibility

Dear Mr. Roth:

At your request, we have conducted an analysis of the cost to construct underground structured parking, focusing on the cost differences between constructing one and two levels of parking. Below is an initial list of cost factors that we have identified thus far. Most non-builders do not properly consider the dramatic differences between one level of parking and two. In particular, the deeper excavation adds risk of encountering groundwater and other soil problems, which would arise for this project, as well as complexity in the support of excavation (sheeting and shoring and underpinning). For example, a one-level excavation that needs sheeting and shoring can often be accomplished with a simple cantilevered pile-driven system and lagging. A deeper excavation, in addition to the additional square footage of support, most often requires the addition of cross-bracing (whalers), concrete heel blocks and steel kickers, or tiebacks. Tiebacks are mechanical devices driven or auger-cast into the adjacent soil to anchor the shoring to help it stay upright and retain the earth. The cost per square foot or per parking space is significantly influenced by the soil type and method of shoring. The increase in cost as depth increases is not linear, but rather more of a geometric cost increase. The same holds true for the concrete work. Cost increase for a deeper foundation is not linear.

With that as the background, here is a summary of the variables impacting this project should a second level of parking be built:

1. Additional cost will be incurred for excavating another subsurface level. More soil, more hauling and disposal.
2. Additional cost will be incurred for construction of another subsurface level: more concrete, larger foundation walls with more reinforcing steel, larger slab beams and a larger mat slab. Also, there will be more lighting, more sprinkler, more ventilation, more plumbing, more waterproofing, more concrete testing and inspections. Additional cost will be incurred to structurally support the ramp from P1 to P2, and to provide a second egress stair from P1 to P2. Code will also require an elevator to reach all levels; so an additional elevator stop will be required on P2. The cost per stop will remain relatively constant, but an additional stop will cost approximately \$25,000. For a project this size, this alone is a significant cost per space.
3. Additional time and general conditions costs will be incurred. Construction of the additional parking level will result in an additional 30-45 days of construction, which translates into approximately \$60,000.
4. The addition of a P2 level will result in a reduction of parking spaces on the P1 level to

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accommodate the second egress stair and the drive aisle turn connecting to the ramp from P1 to P2. This loss of parking spaces on P1 will inherently increase the price/space on the P1 level.

Based on historical averages, the cost to construct P1 is approximately \$35,000 per space, or \$560,000 at 16 spaces. Adding a second level, and factoring in all of the considerations above, will increase the cost of the garage construction to \$52,000 per space.

Please let me know if you have any questions.



Jay Eichberg, President
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