



COUNCIL OF THE DISTRICT OF COLUMBIA
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Mary M. Cheh

Councilmember, Ward 3
Chair, Committee on Transportation and the Environment

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September 9, 2013

Members of the Zoning Commission
Government of the District of Columbia
One Judiciary Square
441 4th Street NW
Suite 200S
Washington, DC 20001

Re: Subtitle C of the Proposed Zoning Regulations

Dear Commissioners,

Like many District residents and community organizations, members of the Council have been closely following the proposed rewrite of the District's zoning regulations – particularly the proposed reduction of parking minimums. Although many of the Office of Planning's ("OP") suggestions will provide necessary updates to antiquated rules, I believe that the proposed reductions in parking minimums, executed without a comprehensive, District-wide plan for parking is troubling. In anticipation of your September 9th meeting to review the proposed plan, I submit this letter to express my thoughts and suggest a course of action that could mitigate the damage of unilateral reductions in parking minimums.

Having reviewed OP's July 29th draft, I have two primary concerns with the proposed changes to the parking minimums. First, the data that supports changes to the parking minimums is not anchored in District-focused analysis. In an effort to evaluate various parking minimum trends, OP apparently reviewed the policies of several U.S. cities, including Portland; however, the data collected from OP's review of those cities is not immediately supportive of the agency's proposed parking minimums because the District has unique parking needs. Simply stated, I would have preferred that the parking minimums put forth by OP were supported by comprehensive data and more refined analysis that take into account the District's size and proximity to both Maryland and Virginia. Second, if enacted, OP's proposed parking minimums will precede other necessary changes to parking management in the District. Although DDOT is currently crafting a city-wide parking management program, I worry that enacting a change in parking minimums without the fuller application of DDOT's plan invites error. Moreover,

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not yet having seen DDOT's plan, I'm loathe to support a reduction in parking minimums for fear that the plan would inadequately address the effects of lost parking associated with changes in minimums.

All of that being said, I recognize the opportunity presented by the current zoning rewrite process to take up the issue of parking minimums. However, it is imperative that you provide that no changes in parking minimums may take effect until DDOT releases and begins action on a comprehensive parking plan. And let's be clear about the scope and character that any such plan must have to sufficiently respond to my concerns. Such a plan must lay out a clear, city-wide vision for parking management; it must recognize and accommodate the different needs and characteristics of different areas of the city; it must demonstrate how the plan integrates with the effects of changes in the parking minimums; it must identify with precision the actions that DDOT will take and the time period for taking them; and, although the plan might to some extent need to be based on a thorough analysis of data from real experiences in other jurisdictions, it must be viewed through the lens of the District's unique attributes; and it must articulate the manner in which the various multi-modal transit approaches can realistically coexist with automobiles and their parking needs.

Thank you very much for your attention to this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary M. Cheh', with a stylized flourish at the end.

Mary M. Cheh
Councilmember, Ward 3

cc: Harriet Tregoning, Director, Office of Planning
Terry Bellamy, Director, District Department of Transportation