

December 5, 2013

Commissioner Bob Summersgill
ANC 3F07
3701 Connecticut Avenue, NW, #139
Washington, DC 20008

Anthony Hood
Chairman
DC Zoning Commission
One Judiciary Square
441 4th Street NW, Suite 200 South
Washington, DC 20001

Re: Zoning Case No. 08-06A, Subtitle C
Testimony in SUPPORT of Case 08-06A, Subtitle C (Parking)

Dear Chairman Hood and the D.C. Zoning Commission:

I support the overall goals of the Office of Planning's proposed zoning regulations. In particular, Subtitle C, chapter 19 on parking. I appreciate the goals stated in section 1900.1, especially 1900.1(c), "Ensure that surface parking areas are planted and landscaped to be compatible with their surroundings, and to reduce environmental impacts."

This goal would be better achieved if throughout the regulations, the Zoning Commission adopts a philosophy of no net loss of green space or trees. There will be occasions when design and practical matters require surface parking or buildings in existing green spaces, but an equal amount of green space and/or trees should be created and planted to make up for the loss. Sections 1905.4 and 1906.1 should explicitly protect the total amount of green space and trees. Section 1903.2 should allow the Board to reduce parking minimums in order to protect trees and green space. Cutting down a tree solely to meet parking minimums should not be allowed.

Section 1907.3(a)(2) is at odds with the Urban Forestry Administration's efforts to plant a tree in every empty tree box in the next five years. Instead of requiring developers to plant street trees, it would be preferable to require them to contribute to the tree fund or to plant trees on private land in the District; ideally, within the same Ward or ANC.

Reducing parking minimums—as the proposal calls for—is a step in the right direction, but it should go further. Subtitle I, Chapter 11 removes parking minimums for downtown. This is a good improvement over the existing regulations, but could be improved if a maximum is set. Parking minimums induce a demand for more cars, more congestion, and more dangers for pedestrians. Parking maximums ensure that we prioritize pedestrians and help make our neighborhoods more walkable.

The proposal calls for shared parking (1901.9), car sharing (1901.11), and bike sharing (1907.3(b)) to offset the minimum parking requirement. Each of these has an effect of removing more than one car from the street. Each space taken by one of these shared systems should result in more than a one for one space. A ten for one substitution is appropriate, but as little as a two for one substitution is better than the proposed regulations. Section 1912.3 will induce a demand for SUVs. The issue of size of parking spaces should be left to market demand, or favor smaller cars.

The zoning regulations can be the tool to eliminate impervious parking lots over time. Allowing for impervious pavements doesn't help the removal of impervious surfaces which, contribute to storm water runoff. Paragraphs 1911.8(b) and 1913.1 can eliminate the phrase, "In addition to traditional impervious surfaces," and allow only pervious parking lot surfaces as we go forward.

Section 1915 is excellent. Paragraph 1915.7 might be better as a reference to section 1703. These sections should be harmonious. Maisie Hughes of Casey Trees and Laszlo Bockh have both submitted testimony for strengthening Chapter 17, and I fully support their suggestions.

A purely formatting issue, section 1915.7(d) through (g) are subservient to (c) and should be indented and renumbered (1) through (4).

Thank you for considering my testimony.

A handwritten signature in black ink, appearing to read "Robert B. Smith". The signature is fluid and cursive, with a long, sweeping horizontal stroke at the end.