

March 15, 2014

Alex Block
1020 Pennsylvania Ave SE, Apt 505
Washington, DC 20003

Anthony Hood
Chairman
DC Zoning Commission
One Judiciary Square
441 Fourth Street NW, Suite 200 S
Washington, DC 20001

Re: Zoning Case No. 08-06A

Chairman Hood and Members of the Zoning Commission,

As a resident of the District of Columbia, I wish to submit testimony in favor of the proposed zoning regulations as offered by the DC Office of Planning. In general, many of the proposed policy changes to the zoning code could stand to be even stronger. However, these proposals still provide a much-needed revision to the District's code. I support the proposed changes and urge the Zoning Commission to adopt these proposals.

I do wish to add comments on parking, corner stores, and accessory dwelling units.

Parking Requirements (Subtitle B):

I support any effort to reduce the amount of required parking in the city. The Comprehensive Plan calls for regulations that are responsive to demand. Given the rise of car-free living, for any given development, a plausible amount of new parking demand is zero. Therefore, the least restrictive regulation would be to not require parking at all. Surely, developers and builders should be allowed to provide parking if necessary, but they should not be *required* to build it at all.

The entire logic behind required on-site parking is tortured and not supported by empirical evidence. In addition to the lack of evidence that on-site parking requirements accomplish their stated goals (to reduce demand for on-street parking), we have a great deal of evidence that such requirements impose significant costs and lead to substantially negative outcomes, often in direct contravention to the Comprehensive Plan.

For example, parking requirements raise the cost of building, and these costs must be passed through to the end users, causing an increase in housing costs. On-site parking also requires

use of space that could be used for other, more productive uses.¹ The combined increase in real costs as well as the opportunity cost hurts the city's quest for affordable housing. Once this unnecessary parking is built, it will eventually get used - only inducing more traffic and congestion (the exact opposite goal of the Comprehensive Plan).

The efforts to reduce the parking burden in the draft code (section 1902 of subtitle C) are good, I support them fully. I would encourage the Commission to go even further in reducing the burden of parking requirements.

Allowing the market to weigh the costs and benefits of parking will better match the burden with the benefit. Eliminating the requirements entirely allows for far more flexibility in managing parking demand, whether via off-site parking or even reduced car ownership and usage. Zoning can be a useful tool for shaping the physical environment of the city, but the tool has limits.

Parking is less about physical space for cars and more about the human behavior habits for transportation. Attempting to regulate that human behavior (rather than built form) through the zoning code is something that has failed and is destined to fail - while adding the severe burden of unintended consequences. Managing the impact to on-street parking is a worthy goal, but it will require regulation via the District's parking regulations, not the zoning code. At worst, parking requirements through the zoning code is expensive and includes many negative externalities.²

In many cases the best way for the Zoning Commission to achieve the city's goals (as outlined in the Comprehensive Plan) is not via regulation, but via relaxation of those regulations. Cities are complex environments, and we should recognize our limited ability to regulate such complex systems efficiently - as well as the benefits of allowing these complex systems and environments to thrive without undue meddling.

The proposed changes in the zoning code are a promising start towards reforming parking requirements. I support the proposed changes.

Corner Stores (Subtitles C and D)

I support the proposals to allow corner stores by right in residential zones. I would also support an even more permissive standards - including the R-5 zones, as well as consideration for the lower-density residential zones.

Accessory Dwelling Units (Subtitle D)

I support the provisions to allow accessory dwelling units by-right in residential zones. I would

¹ For more, see research by Michael Manville:

http://www.its.ucla.edu/research/rpubs/manville_aro_dec_2010.pdf

² For more, see Donald Shoup's research. A sample on parking requirements:

<http://shoup.bol.ucla.edu/Trouble.pdf>

work towards expanding the provisions to make accessory dwelling units easier to build and occupy. Adding additional housing units is an extraordinarily important way for the District to address the price pressures of rising demand for living within the city, add affordable housing stock to the city and do so without major changes to the 'look and feel' of the urban design.

When asking why we should allow these dwelling units, the real question should be why aren't they allowed already? What is the compelling case to ban them?

Process and Participation

Finally, I would like to compliment the Office of Planning and the Office of Zoning for running an unprecedented series of outreach sessions to get the word about about the ZRR. Still, some opponents of this process have said it isn't enough.

However, I would like to express concern that the scale and scope of the outreach and information efforts can never hope to meet an unreasonable standard. As I've expressed above, I think the policy changes proposed as part of the ZRR are relatively minor changes - I would actually like to see more extensive changes to the zoning code, but don't want to let my desire stop real progress in improving the flexibility and adaptability of our zoning code.

Given the extensive public process to date, as well as the relatively minor changes proposed, I encourage the Zoning Commission to adopt the proposals from the Office of Planning.

Thank you for the opportunity to comment on these important issues.

Regards,

A handwritten signature in black ink, appearing to read 'Alex Block', with a stylized, cursive script.

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