

The Committee of 100 on the Federal City



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September 11, 2014

Case No. 08-06A

Mr. Anthony Hood, Chairman
Ms. Marcie Cohen, Vice Chairman
Mr. Robert Miller
Mr. Michael G. Turnbull
Mr. Peter May
DC Zoning Commission
441 4th St., NW
Washington, DC 20001

Dear Zoning Commissioners,

After reviewing the District Department of Transportation's (DDOT) recently released *Curbside Management Study*, The Committee of 100 on the Federal City (C100) is writing to request that the Zoning Commission (ZC) postpone consideration of the Office of Planning's (OP), one-size-fits all changes to the city's parking policies that will overwhelm and undermine the thoughtful framework and policies presented in DDOT's Study.

DDOT's approach is to recognize that a range of options is needed to meet the varied needs of diverse neighborhoods and areas of the city. Further, the *Study* strives to develop clear, consistent and enforceable policies for this precious real estate. OP has refused to acknowledge the city's diversity and continues to press for a singular approach that will hurt many parts of the city and create intensified challenges for DDOT.

DDOT's proposals for more effective and responsive curbside management will only be useful if the city views parking and other curbside uses comprehensively. To isolate curbside policies from related policies will distort the conclusions and inevitably result in conflicting and inconsistent regulations.

For example, the *Study* emphasizes the consensus among commercial establishments that curbside loading zones are too small and too few, and that there is need for more commercial parking. Yet, it fails to mention OP's zoning

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proposals to reduce off-street loading bay sizes and numbers, or to reduce off street commercial parking, or to exempt private development from providing loading and parking for the increased demand they are creating. Further, the *Study* barely mentions private parking supply and demand, perhaps because data does not exist on this topic. Even with the report's acknowledged limitations, it is an important contribution that should not be short-circuited by OP's ideological proposals that lack data and citywide analysis.

Postponing the Zoning Commission's review of OP's proposals will give DDOT time to delve more fully and comprehensively into both public and private parking and loading issues, with better curbside management as the city's population grows. Further examination of curbside management needs to include information on at least three vital issues that are missing from everyone's understanding of parking in the District:

- Private supply of parking and data on user demand in various types of buildings including all residential, commercial and mixed use;
- Effect of population growth on auto and truck ownership and how, even if the rate of ownership goes down, the total number of vehicles will not be static;
- Analysis of how private parking and loading zone requirements link to efficient and effective curbside management particularly given the multiplicity of users that must be served curbside.

In short, OP, and soon the Zoning Commission, could be creating additional demand and more stress on curbside parking and loading that will prevent implementing the approaches laid out in the *Study*. We would hope that even at this late date the Zoning Commission would defer a radical overhaul of related zoning regulations until the three items of information listed above have been addressed and discussed in the context of the proposed parking revisions and forthcoming amendments to the Comprehensive Plan.

These initial comments should not be interpreted to mean that C100 agrees with everything in the *Study*, but it is a very credible beginning and provides the foundation for a productive conversation with the public. The Zoning Commission needs to review this thoughtful document before acting on the parking and loading proposals before you.

We look forward to further discussions on these issues and invite you to contact Nancy MacWood at 202-966-5333.

Thank you for considering this request on a matter of considerable importance.

Sincerely,



Nancy MacWood, Chair



Meg Maguire, Transportation Subcommittee