

Testimony to Zoning Commission
September 14, 2014

Re: Zoning Rewrite (Case 08-06A), Subtitle C

*Opposed to Reduction of Parking Minimums
Without Corresponding Development of Public Parking
and Public Transportation*

I attended the Zoning Commission hearing on September 8, 2014, and witnessed the parade of “Smart Growth” advocates reciting their position. They have filled the testimony in-box with a torrent of written statements. Smart Growth proponents in and outside government are driving the Zoning Regulation Rewrite. Meanwhile, the residents of the city who do not have benefit of professional lobbying organizations to marshal them and provide talking-points, probably believe that the Alternative Text submitted by the Office of Planning has restored parking minimums that were slashed in the September 2013 set-down. Had I not tuned in to the debates over the ZRR, I would have assumed that planning was underway to bring rapid transit options into the 21st century, incentivizing residents to reduce driving. But no, the initiatives are about punishing car ownership, returning to 19th century transportation (bicycles), and reducing developers’ costs and matter-of-right.

Adherents of radically cutting or eliminating parking minimums make statements about how reducing parking availability preserves "choice." They argue that the provision of subterranean parking spaces for more than 16 percent of the residences in a multi-unit dwelling in a transit zone, or 32 percent of units outside a transit zone, will lead to restraint of choice. They claim that increased construction costs to a developer who builds underground parking for 50 percent of the units will be passed on to all buyers or renters in the building, even those who do not own cars, so that non-car-owners will be subsidizing car owners. One solution that would allow a developer to offer an amenity to some residents but not burden all residents with the cost of so doing, would be to charge people who want to use a parking space a fee to do so.

There is also the “smart” growth argument put forth, without a shred of empirical evidence from our city’s experience or the experience of other cities, that relief from parking minimums will incentivize developers to build affordable housing. If the business of real estate development worked that way, there would be affordable apartments all over Manhattan. Instead, there are luxury condos, taxis, and pay garages all over Manhattan.

Another way in which keeping parking-space provisions at the current minimums is said to restrain choice is that cars crowd streets, making bike-riding more difficult and slowing buses. (Buses are getting a lot of love right now from the SG crowd.) But as was pointed out in testimony on September 8, 2014, since car ownership rates have stood essentially unchanged at about 0.9 vehicles per household for decades, **having a place to store a car continues to be crucial to keeping cars off the streets.**

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As a former resident of Manhattan who never drove a car in nine years' residence there--taking subways, buses, and the occasional cab instead--I am partial to fast, frequent, dependable public transportation. Sadly, our public transportation system is not like

New York's, where the subway system has been threaded thickly throughout the city and express buses and commuter trains also serve outlying areas. One might argue that such a system only works in cities with the density provided by skyscrapers. But in sprawling, low-rise, river-dissected Paris, subway lines are more numerous and stops are more densely spaced than in compact, very densely built New York.

I use the Metro for most of my trips downtown, catching it at Tenleytown. Due to the sluggish bus service to my Ward 4 neighborhood (infrequent during much of the day and missing altogether at night and on the weekends), I feel obliged to drive to Tenleytown, and once there, the hunt is on for a place to put my car. (The Friendship Heights station is closer, but there's nowhere to leave a car for any length of time.) Since curbside parking along Tenleytown's neighborhood streets is restricted to residents of Ward 3, and metered parking near the station maxes out at four hours (formerly six hours), Metro riders who drive to Tenleytown from another ward have limited choices: (1) cutting their trip downtown short so that they can stay within four hours' metered parking (at a cost of \$8.00 for the meter, plus almost \$4.00 on the Metro outside of rush hour; more during rush hour), *if available*; (2) parking in a secret alley several blocks away that holds about six cars, *if available*; or (3) parking in front of my friend's house on a two-hour-maximum residential street where for some reason I have not been ticketed despite staying beyond the limit, *if available*. When I am pressed for time and anticipate that these options will be unavailable, I simply drive downtown. Many people drive in this city because the obstacles to doing otherwise are too high. Then there are people who simply *avoid* the District, because of the driving and parking challenges—a lost chance for our businesses to gain revenue and the government, taxes. (Truly, how many residents of Maryland and Virginia are going to bike to D.C. to sight-see, shop or eat in a restaurant?)

On the other hand, some of the cars around the Tenleytown Metro bear Maryland license plates. Perhaps some of those Marylanders who occupy D.C. residential street-parking to take the Metro downtown are purchasing goods and services in our city, which is a good thing; many probably work downtown (but don't pay a commuter tax). But drivers who park in front of other people's homes in order to take the Metro could just as easily live at a distance in the District. Regardless of the source of the visiting cars, single-family-home dwellers near the Tenleytown Metro find it difficult to park on their own street during the workweek, with so many out-of-neighborhood people parking there.

Under the terms of a special agreement with the ANC, an apartment building with no parking spaces at all is going up on Wisconsin Avenue in Tenleytown. Apartment dwellers will have to pledge that they do not and will not own a car in order to live there. Should enforcement prove to be lax, apartment residents' cars could well end up in front of single-family homes, adding to the problem of Metro parking.

I raised this question with OP Deputy Director Jennifer Steingasser at an OP open house in April 2014: Why not provide ample (affordable) parking at Metro stations situated on the outer edges of D.C., to accommodate the cars of people who live far from Metro stations (or a frequently running bus line)? The map that OP recently prepared, entitled "DDOT Curbside Inventory: Average Vehicles per Household by Census Tract" (see figure below, last page) clearly illustrates that the parts of the city where cars are owned in greatest numbers are furthest from the core, in the far corners of Wards 3 and 4 (I live in one of the maroon patches on the border with Maryland in Ward 4; in black and white, this will appear as the darkest color), and Wards 7 and 8. These are also the parts

of the city most scantily served by public transportation.

Ms. Steingasser told me that no one had ever raised the deficit in intermodal car-to-Metro transfers, or suggested the parking-structure solution to her before. Since Metro opened with parking facilities at some stations both at the ends of lines and close in (e.g., Silver Spring) 40 years ago, I wonder why OP and WMATA haven't expanded this model to D.C. Or failing that, why they haven't worked together to expand rapid transit in town. The recently opened Silver line is still based on the mid-20th-century model of bringing people to work in downtown D.C. from the suburbs.

This same issue about parking problems around Metro stations was raised at the Zoning Commission hearing on September 8, 2014, by a nurse who lives in Ward 7. Public transportation has always been sparse across the river and that problem has been exacerbated by cuts in the schedule for the 30 bus, which serves as cross-town transportation. She recounted that great numbers of Prince George's County residents park on residential streets near Metro stops, making parking difficult for residents when they arrive home.

Depending upon the reduced-service 30 bus can mean a 2-hour trip to downtown. Who can afford to spend his or her time riding a bus four hours a day? The witness pointed out that this is the very reason that poor people own cars. The working poor depend on cars more than most people, to get from one job to another, jobs that often are not located in the well-served-by-public-transportation urban core.

Smart-Growthers frequently refer to the beauty of letting the market determine the number of parking spaces to be provided by the developer of any given project. (Never mind that zoning as a governmental function was invented to modulate market forces.) Yet in the OP's various proposals we see attempts to manipulate the market by going so far as to levy a monetary penalty if a developer acts on his determination that there is a market for more than one parking space for each of 49 percent of the units in an apartment building, or in the most recent revision, 66 percent of the units.

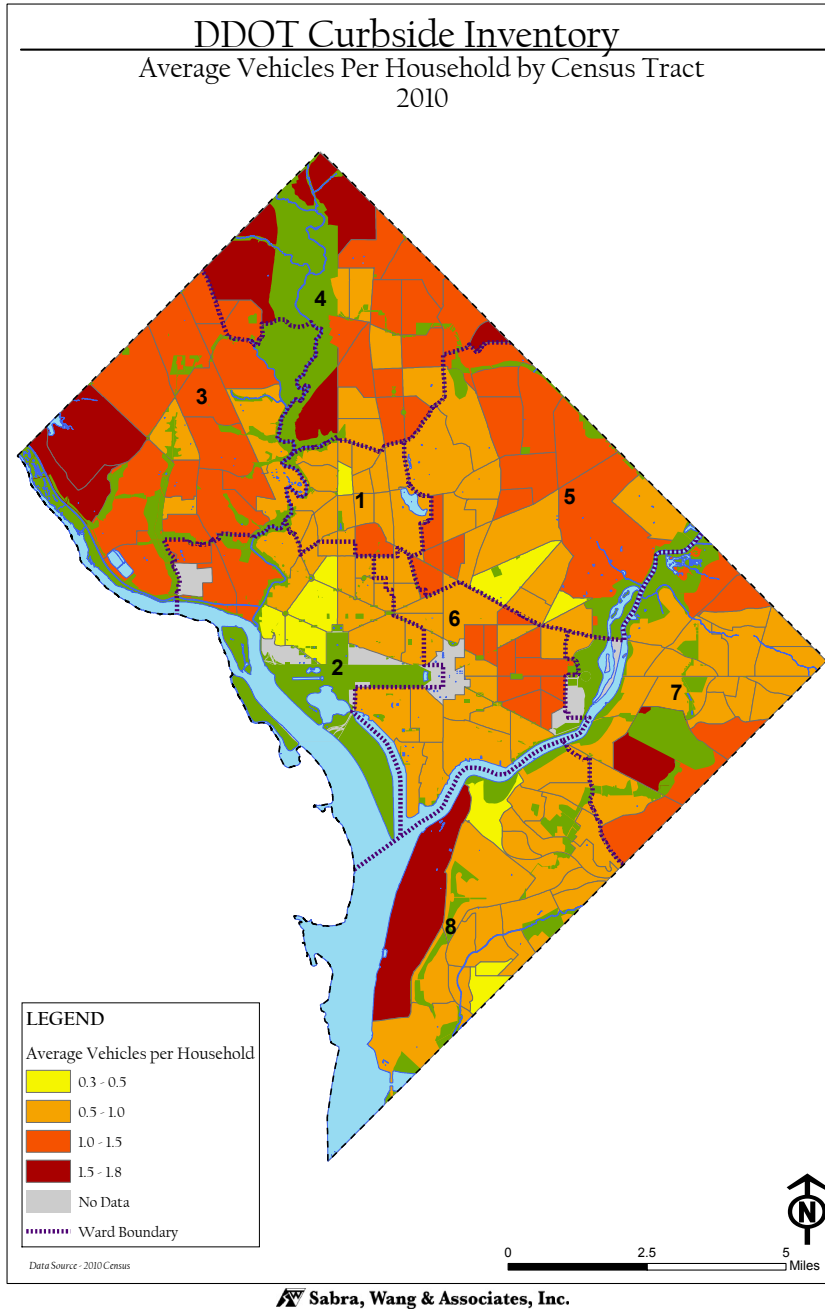
The Deputy Mayor of Planning and Economic Development and OP say D.C. must have amenities that will bring people into the city to spend their money, but they make the act of moving around the city such a struggle, who can blame people for heading out of the city to shop, see a movie, eat in a restaurant? Or for that matter, to settle down?

Big picture, as I see it: Each agency serving our city works in a silo. For what appear to be ideological reasons, OP wants to make car *ownership*, not just car use, onerous. DDoT reduces curbside parking available to people who don't live in the ward, or in many places, on the block, and levies heavy meter fees on the remaining curbside parking. Meanwhile, WMATA, instead of building infill public transportation to make a rail, bus, and streetcar system a viable alternative to driving for residents, commuters, and visitors from the 'burbs, cuts bus routes and schedules and struggles with maintaining even the inadequate Metro system we have. And no one connects the dots between *all* transportation modalities.

Making rules that punish car ownership and use without offering realistic transportation alternatives puts the cart before the horse. Please don't institutionalize dysfunction by codifying it.

Thank you very much for your consideration.

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<https://comp.ddot.dc.gov/Documents/Average%20Vehicles%20Per%20Household%20by%20Census%20Tract%20Map.pdf>