



September 15, 2014

Zoning Commission of the District of Columbia
One Judiciary Square, Suite 210 South
441 Fourth Street, NW
Washington, DC 20001

Re: ZC Case 08-06A Definitions Proposed for Automated Parking and Other Garages (ZRR)

Honorable Members of the Commission:

From prior summaries of recommendations, we know that the Office of Planning (“OP”) favors both changing the term “Mechanical Parking Garage” to “Automated Parking Garage”, but also to allow such systems by right, ideas we have been supporting through the entire “zoning Update” or “Zoning Regulation Review” (“ZRR”, ZC Case 08-06A). We know of no opposition to these in the overall record. So, we are hopeful that you will continue down that course and, if delays appear to slow down adoption of other provisions, whether related to parking or not, that “automated parking” might become a by-right option even under the present regulatory framework.

That said, we believe that what OP is recommending as a definition is inappropriate in that it refers to both “elevators” and their “operators” when referring to an automated garage. “Elevators” in the sense generally understood would rarely be the means by which vehicles would be moved vertically in an automated setting, and no vehicle in movement is accompanied by an “operator.” Moreover, OP’s definition makes no mention of lateral movement and does not specify that the entire operation is computerized. In fact, there is no inherent requirement for an attendant at all, particularly where the vehicles are ones associated with drivers who are familiar with the system, as in an apartment house.

In our testimony and prior documents, we also urged that what OP would define as “public garages” (and we would define as “parking garages”) be allowed to provide incidental services, thus sparing round trips from and back to the garage for something minor that could be provided within as an accessory use — without creating a service “destination” for others. We would hope DC-DoT and OP would support this, too. Our proposed language accomplishes this. Such an option would not be inconsistent in any location where the garage is already open to the general public, operating as a commercial facility, something that would be typical in non-Residence zone districts, but we would think it could also be effective and benefit residents of apartment buildings just as well provided the services are not offered to non-residents.

We attach a comparison of existing, OP-proposed/advertised, and our proposed definitions for your consideration.

You will note that the existing, advertised, and proposed definitions distinguish “private garages” from others mainly on the basis of square footage, the tipping point being at 900 square feet. Our language retains that — whatever its origin and purpose — as doing otherwise would complicate steps to allow “automated parking” to become part of the existing regulatory scheme soon, and not be delayed for until the overall ZRR process is complete and in effect.

We also attach citations to all the places in the current code where there are references to “Mechanical Parking Garage” as these may need to be repealed if “automated parking garage” essentially replaces “mechanical parking garage” since that use is first allowed, but subject to BZA approval, in C-3-A and C-3-B zone districts and is only “by right” in C-3-C and more permissive zone districts. To us, the benefits of automated parking should be “by right” across the District as it can provide storage for more vehicles in a much more compact space, less excavation, lower height, etc.



One of PDS's principals, Marc Slavin of "MarcParc," operates several parking facilities with "mechanical stackers." These are not "mechanical parking garages" as now defined. Indeed, none of us is able to identify a single garage facility now in operation in the District of Columbia that meets the specifications of "Mechanical Parking Garage." One of the last ones may have been the vertical/elevator system on the north side of New York Avenue in the 1400 block, razed more than a decade ago. Mechanical stackers are currently allowed as mechanical equipment whose presence is not a use-determining threshold; presumably, this would continue unchanged.

Finally, we alert you that we have combined our comments on the definition proposed for Floor Area Ratio by OP mid-July with those of our advisor, Lindsley Williams. That is found in a separate submission.

Thank you.

Frederick E. Gorove, P.E.

Garages and Automated Parking in the District of Columbia Zoning Regulations – Existing, Advertised, and PDS' Recommendations		
Existing Definitions	Definitions Advertised for Hearing July 2014	Definitions PDS Recommends Mid-Sept 2014
Garage, mechanical parking - a building or other structure without repair or service facilities in which parking is accomplished entirely by means of elevators and in such a manner that there is no human occupancy other than by the elevator operators anywhere except on the main floor.	Garage, Mechanical Automated Parking: A building or other structure without repair or service facilities in which parking is accomplished entirely by means of elevators and in such manner that there is no human occupancy other than by the elevator operators anywhere except on the main floor. May also be a public garage.	Garage, Automated: A parking garage or private garage in which vehicles are stored within a dedicated part of a building, moved laterally and vertically into and returned therefrom entirely by computerized, robotically controlled systems of platforms, pallets, shuttles, cranes, and lifts activated by either the vehicle's driver, passenger, or attendant prior to the location where robotic systems take over from the driver or return the vehicle to the driver. <i>[“Elevators” not typical, “elevator operators” not at all.]</i>
Garage, parking - a building or other structure, or part of a building or structure, over nine hundred square feet (900 sq. ft.) in area, used for the parking of motor vehicles without repair or service facilities. The term parking garage may include a parking garage accessory to the principal use, but shall not include a mechanical parking garage.	Garage, Parking: A building or other structure, or part of a building or structure, not exceeding nine hundred square feet (900 sq. ft.) in area, used for the parking of motor vehicles and having no repair or service facilities. <i>[OP would delete the second sentence of existing definition from the zoning regulations.]</i>	<i>[Consolidate with public garage but use the term parking garage instead.]</i> <i>[Allow incidental services for and minor repairs to vehicles parked therein, be the facility automated or not, thus eliminating unnecessary vehicular trips by providing those incidental activities on site instead.]</i>
Garage, private - a building or other structure, or part of a building or structure, not exceeding nine hundred square feet (900 sq. ft.) in area, used for the parking of one (1) or more motor vehicles and having no repair or service facilities.	<i>[Definition would not continue in zoning regulations]</i>	Garage, private - a building or other structure, or part of a building or structure, not exceeding nine hundred square feet (900 sq. ft.) in area, used for the parking of one (1) or more motor vehicles and having no repair or service facilities. <i>[Retain this definition: see “automated garage” above.]</i>
Garage, public storage - a building or other structure, or part of a building or structure, in which any repair, greasing, washing, or similar services are incidental to its primary use for the parking of motor vehicles.	Garage, Public: A building or other structure, or part of a building or structure, over nine hundred square feet (900 sq. ft.) in area, used for the parking of one (1) or more motor vehicles and having no repair or service facilities.	Garage, parking: A building or other structure, or part of a building or structure, over nine hundred square feet (900 sq. ft.) in area, used for the parking of one (1) or more motor vehicles either as a principle use <i>[where allowed]</i> or accessory use, wherein cleaning/detailing and similar services may be offered for parked vehicles. If within a building or part thereof, may also be an automated parking garage.
Garage, repair - a building or other structure, or part of a building or structure, with facilities for the repair of motor vehicles, including body and fender repair, painting, rebuilding, reconditioning, upholstering, equipping, or other motor vehicle maintenance or repair.	Garage, Repair: A building or other structure, or part of a building or structure, with facilities for the repair of motor vehicles, including body and fender repair, painting, rebuilding, reconditioning, upholstering, equipping, or other motor vehicle maintenance or repair.	<i>[No change recommended]</i>

Where does the term “Mechanical Parking Garage” appear currently in the zoning regulations? How should current regulations be modified if this definition is deleted now, before overall ZRR implementation?		
Chapter/Section/Paragraph	Term in context	Recommended action
199.1	Garage, mechanical parking <i>[is defined]</i>	Delete
199.1	Garage, parking <i>[is defined in manner that explicitly excludes “mechanical parking garage”]</i>	Follow recommendation in chart provided (above)
741.2(b)	Provides for gasoline sales accessory to a mechanical parking garage in C-3 zone districts, and other more permissive C districts	Delete; possibly allow or control gasoline sales as independent use if and as warranted
741.5(b)	Allows establishment of a mechanical parking garage by right in C-3-C and more permissive C districts	Delete, as parking garages already allowed by right, automated or not.
743.1	Provides for special exception review and approval of applications to expand or establish gasoline service stations and mechanical parking garages in C-3-A and C-3-B zone districts	Delete portion pertaining to mechanical parking garages for reasons noted about 741.5(b)
841.2	Provides assumed ceiling height for mechanical parking garages to be applied in determination of FAR for mechanical parking garages in CM and M districts	Delete; rely instead on recommended provisions for definition of FAR, above.
Chapter 23’s 2302 heading at beginning of chapter and again at heading to that section	Full title of section currently includes Mechanical Parking Garages among list of other types	Conform each to list of definitions finally adopted, but eliminate “ mechanical parking garage ”
2302.1	Provisions include reference to mechanical parking garage among list of other types	Conform to list of definitions finally adopted, but eliminate “ mechanical parking garage ”
3104.1	Provides standards for special exception review by the Board of Zoning Adjustment for mechanical parking garage	Delete; other provisions provide for special exceptions for other types of garages where appropriate.