

The Committee of 100 on the Federal City



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Dear Councilmembers Mayor Gray,

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 urge you to request the Zoning Commission (ZC) to postpone consideration of the Office of Planning's (OP) radical, one-size-fits all changes to the city's parking and loading policies that will overwhelm and undermine the thoughtful framework and policy approaches presented in DDOT's Study. The ZC hearing record on the Zoning Regulation Review (ZRR) will close on September 15 and the Commission will begin consideration of proposals from one agency that are in stark contrast with those from the agency tasked with both policy and implementation authority for parking and loading.

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. DDOT's report acknowledges that public space cannot accommodate the growing number of users for finite curbside space and that trade-offs will be necessary. OP has complicated the potential citywide dialogue that DDOT envisions by wrongly proposing to immediately limit private developer's responsibility for providing off-street parking and loading to accommodate newly created demand, thus, transferring the demand to the public curbside. 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 be useful only if the city views parking and other curbside uses comprehensively. To isolate curbside policies from other related policies will distort the conclusions, frustrate the achievement of goals, 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 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. OP's proposals result from the same incomplete assessment and analysis. However, even though the DDOT *Study* acknowledged limitations, it is a long-needed and important start 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:

- 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 continues to increase;
- 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 you would ask the Zoning Commission to defer a radical overhaul of related zoning regulations until DDOT concludes its data collection, analysis, and proposed citywide discussion. It is appropriate and timely that your office support DDOT's effort to engage a robust citywide discussion – without the burden of new parking and loading regulations – so that the public can engage in a broad discussion of the appropriate use of public assets and the responsible role of private resources during the forthcoming amendments to the Comprehensive Plan amendment cycle.

In addition, C100 strongly recommends that the overall goals of curbside management and the proposed action plan be included in the *moveDC* plan that suffers from lack of this perspective.

These initial comments should not be interpreted to mean that C100 agrees with everything in the study, but it is a credible beginning and provides the foundation for a productive conversation with the public. The C100 will comment more on particular aspects of the proposals in the future.

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



Nancy MacWood, Chair

Meg Maguire, Transportation Subcommittee