



September 11, 2014

Case No. 08-06A – Subtitle C – Vehicle Parking

Founded 1923

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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) radical, 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. 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 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. 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 the Zoning Commission would defer a radical overhaul of related zoning regulations until DDOT concludes its data collection, analysis, and proposed citywide discussion.

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 Zoning Commission needs to review this thoughtful document before acting on the 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.

A handwritten signature in cursive script that reads "Meg Maguire". The signature is written in black ink and is centered on the page.

Nancy MacWood, Chair

Meg Maguire, Transportation Subcommittee