

July 28, 2008

Anthony Hood, Chairman
Zoning Commission
District of Columbia Office of Zoning
Suite 210-S
441 4th Street, N.W.
Washington, D.C. 20001

Re: Zoning Commission Case 08-06-2
Proposed Amendments to the Parking Regulations 11 DCMR
Comments by Marilyn J. Simon on OP Memorandum dated July 15

The Office of Planning describes the proposed policy changes to include: (1) general removal of parking minimums; (2) retention of minimums for uses that are of concern to residential neighborhoods; (3) setting of parking maximums; and (4) supportive strategies including shared parking, car-share parking, in-lieu fees and bike parking. These recommendations differ substantially from the draft recommendations that were circulated in March. Nevertheless, the concerns expressed in my April 15 comments on the draft Vehicle Parking Chapter and the Nelson/Nygaard reports still apply, and new concerns are raised by most of OP's the subsequent changes.

As with the material provided earlier, the explanations provided by OP in the July 15 Memorandum fail to support their radical recommendations. Some of the responses, such as the assertion on page 13 that DC has "an incredibly robust transportation system," illustrate the ways in which the Office of Planning fails to grasp the basic assumptions of the analysis on which they have relied in recommending these radical changes in the regulation of parking. Some of the information presented simply has no bearing on the issue.

The Office of Planning states that the recommendations are based on recent studies, literature and available statistics and government reports. However, they have not presented studies, literature, statistics or reports sufficient to support these recommendations. In addition, they have overlooked government reports and statistics that document existing spillover issues and support the conclusion that these recommendations will increase spillover parking in many District neighborhoods, increase traffic and pollution in some residential areas, and reduce the quality of life in the impacted neighborhoods.

The percentage of households in low- and moderate-density neighborhoods that would be impacted by this proposal will be substantial. The Coalition for Smarter Growth calculates that 11% of the land area in low- and moderate-density residential neighborhoods would be impacted by the recommendation to eliminate minimum parking requirements for office development in some zones. This estimate, however, only includes a fraction of the area that would be impacted by this proposal.¹

¹ The CSG estimate, while showing that this proposal will impact a large number of District residents, grossly understates the impact of the proposal. CSG does not include, in this estimate, the recommendation to eliminate minimum parking requirements for residential development, in particular for higher density residential development near low- and moderate density residential zones. This would add a significant land area to the 11% already included. In addition, the percentage of households affected by the elimination of minimum parking requirements

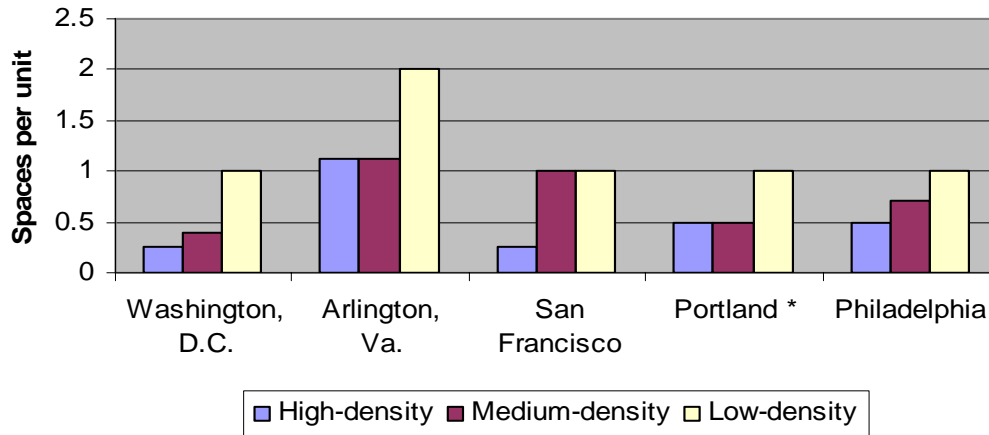
Minimum Parking Requirements

OP's Recommendation to eliminate most minimum parking requirements has no foundation and would rely on implementation of controversial policies by other agencies

- No analysis of “spillover.” The Office of Planning has recommended eliminating many minimum parking requirements, which are used to address spillover parking issues, but has not considered spillover parking in making this recommendation.
 - OP has done no analysis of the extent of spillover parking and the impact of spillover parking on the District's neighborhood -- spillover parking that we observe even with minimum parking requirements, as well as in neighborhoods near buildings that were not subject to minimum parking requirements;
 - OP has provided no data on current vehicle ownership per household in DC, nor have they provided any analysis that demonstrates that elimination of minimum parking requirements would result in a decrease in vehicle ownership per household, rather than an increase in demand for on-street parking, i.e., parking spillover. Instead, OP simply seems to conclude that if the parking regulations are revised, new development will have less automobile ownership.
 - The impact of spillover parking on the District's neighborhoods is a recurrent theme in the 2006 Comprehensive Plan, and yet the assertion that “Current parking standards do not reflect the traffic and parking policies of the city or the Comprehensive Plan” is the only issue listed as the basis for the recommendation to eliminate many minimum parking requirements.
- No analysis of DC's current parking requirements. The Office of Planning's analysis seems to be based largely on theoretical statements about how minimum parking requirements in other jurisdictions are based on ITE estimates and thus might exceed appropriate requirements for an urban environment. OP's analysis ignores the fact that DC's current minimum parking requirements are significantly lower than those in many other jurisdictions, including jurisdictions like Arlington, Virginia, San Francisco, Portland and Philadelphia, all cited in the Nelson/Nygaard reports.

for commercial uses in some zones and for residential uses in all zones, including higher density residential development near low- and moderate-density neighborhoods, would be significantly higher. The CSG estimate is based on a distance of 400 feet from a zone that would allow office development without minimum parking requirements under the proposed regulations. Current zoning regulations allow a reduction of 25% in the minimum parking requirement for developments near a Metrorail station only if the development is “at least 800 feet from any R-1, R-2, R-3 or R-4 District.” §2104.1(a). In addition to not including the impact of higher density residential development without minimum parking requirements near low- and moderate density neighborhoods, CSG's estimate is based on land area. Since the low- and moderate density development near commercial and higher density zones tends to have more households per acre than other low and moderate density area, the percentage of households affected would be even higher.

Minimum Parking Requirements: Residential



Comparison of DC’s Current and Proposed Parking Requirements with Arlington, San Francisco, Portland and Philadelphia: Residential Uses

	Comparison with Current DC Zoning Regulations
Arlington, Virginia	Minimum Parking Requirement for Residential Uses: All Zones: 2-4 times the current DC minimums
San Francisco	Minimum Parking Requirement for Residential Uses: Medium density zones: 2 times DC minimums Low- and high density zones: same as current DC minimum
Portland	Minimum Parking Requirement for Residential Uses: Medium and high density zones: higher than current DC minimums Low density zones: same as current DC minimum
Philadelphia	Minimum Parking Requirement for Residential Uses: Medium and high density zones: higher than current DC minimums Low density zones: same as current DC minimum
OP Proposal	Eliminate all minimum parking requirements for residential uses

Even if some jurisdictions have minimum parking requirements that exceed appropriate levels for an urban environment, that would not justify the recommendation to eliminate most minimum parking requirements, but would, at most, justify a review of whether our minimum parking requirements are appropriate, excessive or inadequate.

- No basis for OP’s list of concerns. The Office of Planning lists ten implications of having excess off-street parking² but has not determined that minimum parking requirements would produce excess off-street parking, nor have they demonstrated that minimum parking requirements have any of the listed impacts. For many of the current minimum parking

² Office of Planning, Report to the Zoning Commission, July 15, 2008, page 12.

requirements, these impacts are unlikely, improbable or would have minimal possible harm relative to the benefit of having adequate off-street parking.³ In fact, current minimum parking requirements could not produce excess off-street parking, since the levels are far below the associated parking needs. For example, for residential uses, the minimum parking requirements range from 0.25 to 1.0 spaces per unit, while vehicle ownership averages 1.27 vehicles per households, and the residential uses also generate parking demand for employees and guests.

- Unrealistic assumptions about transportation system and percent of households likely to have fewer private vehicles or no vehicles. The Office of Planning reaches conclusions based on assumptions about the existence of a transportation system that is sufficiently robust as to allow a large percentage of DC households of all types to decide to own no private vehicles.
 - Yet, while our transportation system is a good commuter system, and in 2006, 39% of working District residents used public transportation to commute to work, the transportation system is not an adequate substitute for a private vehicle for many needs of many households.⁴
 - OP has not produced any evidence to indicate that it the transportation system is sufficiently robust to support a significant increase in the percentage of households that own no vehicle or a significant decrease in the number of vehicles per household.
- Misrepresentation of the Nelson/Nygaard summary of parking regulation in other jurisdictions. In the July 15 Report, the Office of Planning relies on the Nelson/Nygaard report, and bases their recommendation, in part, on the finding that “the study shows a growing shift across the nation away from parking minimums.” The Nelson/Nygaard report did not present evidence of a growing shift away from parking minimums, but instead presented evidence of some cities have implemented a very limited elimination of minimum parking requirements for some uses in small geographic areas. Many of these jurisdictions have minimum parking requirements that are higher than DC’s current standards, let along the proposed reductions.
- Recommended policies have not been implemented elsewhere and have not been evaluated. A policy is generally only considered to be a “best practice” if it has not only been adopted elsewhere, but also has been evaluated to demonstrate that it is successful. Such an evaluation could not be done, inasmuch as no jurisdiction has adopted the type of policy that OP is recommending, and even for those that have adopted much more limited policies, the adoption is too recent to be able to evaluate the impact. Nelson/Nygaard has defined certain policies as “best practices,” but has provided no examples of other jurisdictions that have adopted these policies on the scale that is recommended in their report and included in draft language included in the Public Notice. For those examples where a municipality has implemented some portion of their recommendations, the policies were implemented in very limited geographic areas. Nelson/Nygaard did not provide studies or data that could be used to evaluate the impact of these policies, either on residents’ use of private vehicles and public transportation, or on spillover parking in the adjoining residential neighborhoods, if there even are any adjoining low and moderate density residential neighborhoods in those jurisdictions. Thus, it is impossible to determine whether the policies, even in those limited areas, had the desired effect. It is also impossible to determine whether implementation of those policies, if they were even actually

³ The individual claims are discussed at pages 12-13, below.

⁴ This is discussed in more detail at page 11, below.

implemented near areas comparable to the affected DC neighborhoods, had an adverse impact on neighborhoods in those cities.

An unsupported assertion that these practices are “best practices” does not justify the recommendation for such far reaching changes. Nelson/Nygaard and OP have provided no examples of jurisdictions that have implemented these recommendations on the scale recommended. There are no examples where any of these policies, even on a smaller scale, have been in place for a sufficiently long period of time to allow a careful evaluation of whether the policies achieved the intended goals or had any negative consequences.

- Policies to address “spillover” that will result from this recommendation cannot be implemented by OP or the Zoning Commission. The Office of Planning is assuming that the additional spillover issues that will result from this proposal can be addressed, but the policies would need to be implemented by other agencies. Some of the policies that OP cites as ways to address the concerns have already been discussed by the Mayor’s Parking Taskforce, which issued a report in December 2003. Some of the recommendations also violate one of the first fundamental goals identified by that taskforce: “The priority user for parking in residential areas in the District is neighborhood residents.”⁵
- Inconsistencies in remaining requirements. The minimum parking requirements schedule has inconsistencies with no plausible explanation. For example, schools located in an R-2 zone would have a minimum parking requirement, while schools in the C-2 zone across the alley would have none. In the residential zones, the minimum parking requirement for a high school is no higher than the minimum parking requirement for an elementary school with the same square footage. In the C-2 zones, there is no distinction between different commercial uses that might have very different parking needs, so a food delivery service would require the same number of spaces per square foot as a fast food restaurant. There is no minimum parking requirement for hospitals. There is no minimum parking requirement for high-density residential buildings near lower-density neighborhoods, where spillover would be inevitable, with the resulting increases in traffic and pollution in our neighborhoods.

Parking Maximums

The imposition of parking maximums in the absence of hard data and significant research can lead to distortions. The Office of Planning is recommending parking maximums, perhaps city-wide, even though one Nelson/Nygaard paper, published by the American Planning Association, citing Donald Shoup, warns against the imposition of parking maximums in the absence of hard data. It is noted that Cambridge and Portland instituted very limited parking maximums based on significant research.

Imposition of parking maximums without sufficient research can deter development and can result in projects where developers have difficulty renting or selling residential units or renting office space. Imposition of parking maximums which are too low can make it difficult for developers to rent retail or restaurant space or limit the ability of retailers and restaurants to attract customers or diners who might instead patronize businesses in areas that are easier to reach.

⁵ Mayor’s Parking Taskforce Report, December 2003, page 17.

Relief from Parking Minimums

The proposal for relief from minimum parking requirements does not include a public interest evaluation with an analysis of the impact on the neighborhood, nor does it allow for community input. Although few minimum parking requirements remain, the proposal to allow a 50% reduction in the parking requirement, subject to DDOT review and a contribution to DDOT, allows for too much flexibility without sufficient review. This is critical since OP has not examined whether the proposed minimum parking requirements are sufficient to mitigate the harm to neighborhoods from parking spillover and the proposed parking requirements are significantly lower than many of the minimum parking requirements in similar jurisdictions with similar transit systems. The provision by which the reduction in the parking requirement is contingent on a contribution to DDOT, where DDOT is the only agency responsible for reviewing the request for the reduction, creates a perverse incentive. Further, the proposed regulations do not even specify that the impact on the neighborhood should be considered in the review. P3.2 does not offer District residents an opportunity to present their concerns to, for example, the BZA about a request for a reduction of up to 50% in the number of parking spaces required and does not provide residents with assurance that DDOT will be carefully evaluating the impact of the requested flexibility on the District's neighborhoods.

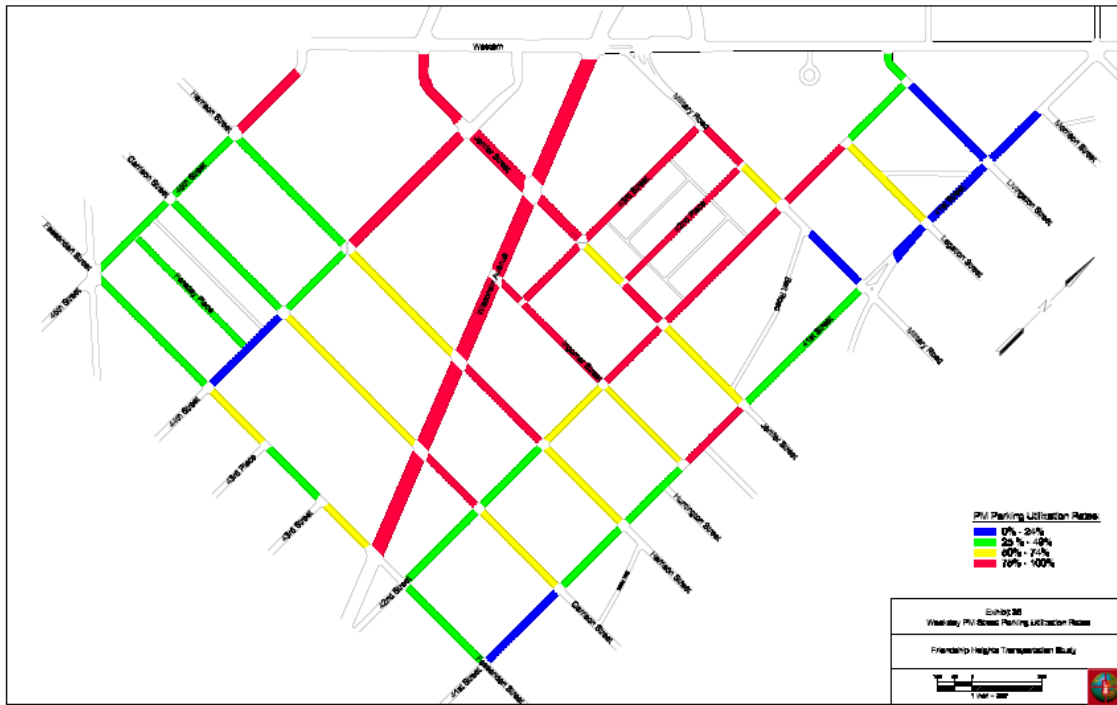
Spillover Parking in our Low- and Moderate-density Neighborhoods

The Office of Planning has done no analysis of spillover parking in the District, yet is recommending that "as a general rule, minimum parking requirements should be removed from the parking schedule." However, the impact of spillover parking on our neighborhoods is evident, and has been documented in some DDOT reports. OP has not considered those DDOT reports in making this recommendation.

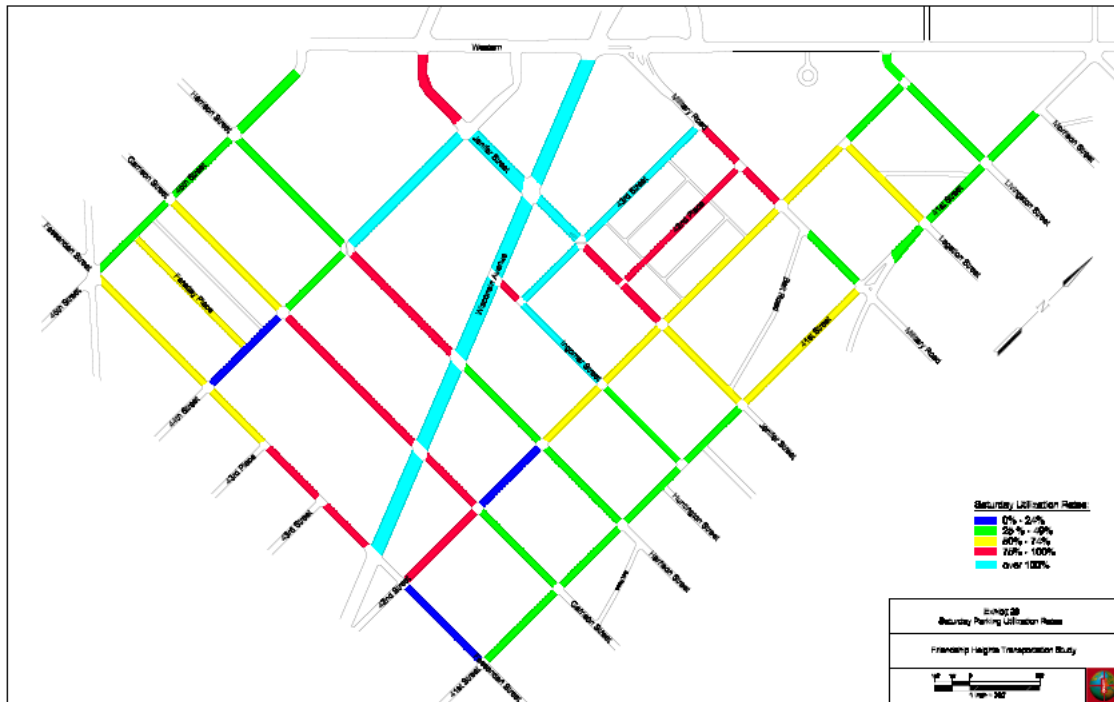
Spillover parking has had an impact on residential neighborhoods that are near older residential buildings and commercial buildings that do not meet the current minimum parking requirements and have insufficient parking to serve the needs of the residents, guests, employees and clients. Spillover parking has also had an impact in residential neighborhoods that are near buildings that meet current minimum parking requirements, but for which the available parking is inadequate.

The following two exhibits from DDOT's Friendship Heights Transportation Study show the parking spillover near the commercial development on upper Wisconsin Avenue. The parking counts were done on April 22, 2003 and May 3, 2003, and since then, with additional development, the spillover parking has only increased. Outside of the commercial area, the area in the maps is zoned R-2, low density residential. For the weekday counts, many of the blocks that are labeled as having 75-100% parking utilization actually have 94-100% utilization. The actual counts are in Appendix I of the FHTS on the DDOT web-site.

FHTS: Weekday PM Parking Utilization Rates



FHTS: Weekend Parking Utilization Rates



Light blue indicates streets where parking utilization exceeds 100%, i.e. all legal spaces used with some additional cars parked.

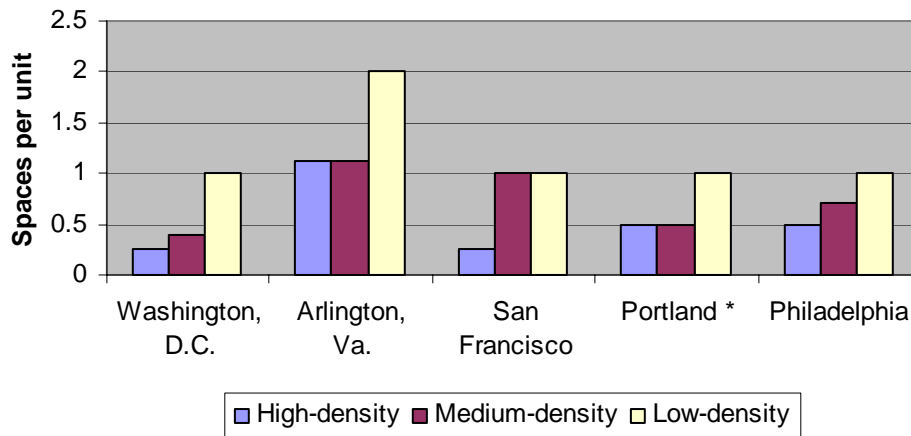
Spillover Parking and the 2006 Comprehensive Plan

In recommending that “as a general rule, minimum parking standards should be removed from the parking schedule,” the only issue that OP cites is that “current parking standards do not reflect the traffic and parking policies of the city or of the Comprehensive Plan.” Yet the impact of spillover parking is a recurrent theme in the Comprehensive Plan. In addition, the elimination of minimum parking requirements for residential uses cannot possibly be considered to be consistent with the Policy LU-2.1.11, which describes how the parking requirements for residential buildings should be defined, to “ensure that the parking requirements are responsive to varying levels of demand associated with different unit types, unit sizes, and unit locations.”

Many of DC’s Current Minimum Parking Requirements are Lower than Those of other Cities

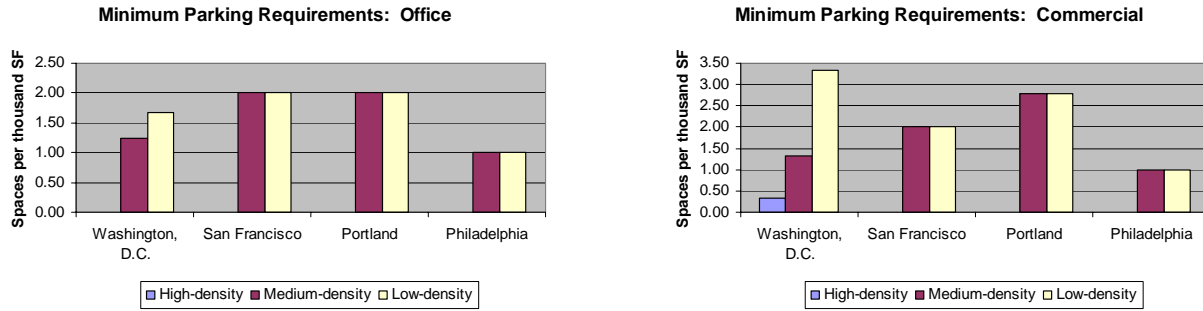
The following charts compare DC’s minimum parking requirements for high-density, medium-density and low-density zones with those of several other cities. In each of the zones, the minimum parking requirement for residential uses in DC is equal to or lower than that of each of the other cities. It is significantly lower than the minimum parking requirement for residential uses in Arlington, Virginia, which has the same transportation system as DC, but has a residential parking requirement two- to four-times our minimum residential parking requirements. While our current minimum requirements are lower than those of many other urban jurisdictions, OP is recommending that we discard even those minimums.

Minimum Parking Requirements: Residential



* Portland minimum is for high-density residential zones outside of "Central Residential Zone"

Source: Nelson/Nygaard Existing Zoning Review, page 2; Arlington County Zoning Ordinance, Chapter 33; Portland, Chapter 33.



Source: Nelson/Nygaard Existing Zoning Review, page 2

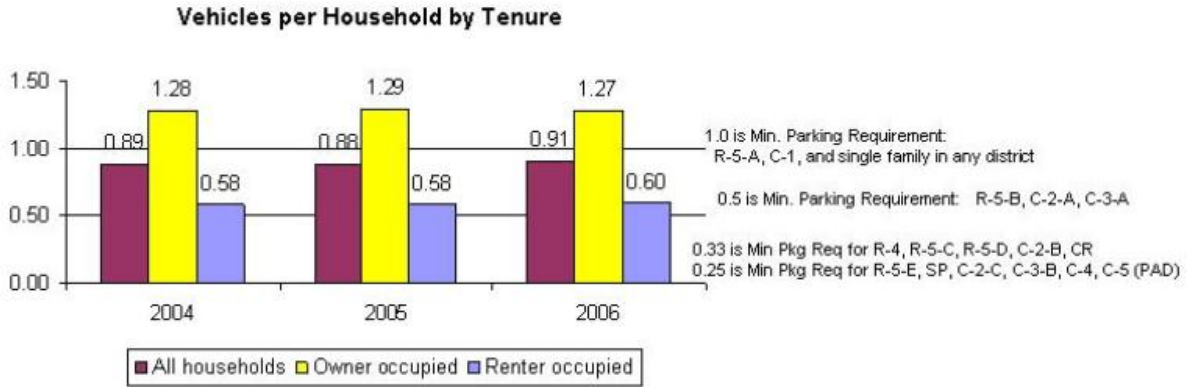
Arlington, Virginia has minimum parking requirements for residential uses, even for apartments near the Metro, which are significantly higher than the current minimum parking requirements in DC, let along those now proposed by OP.

Portland has minimums for most of the city that exceed those in DC's current regulations. For example, for residential zones outside of the "central residential zone" and the "high density residential zone," there is a minimum parking requirement of one space for each dwelling unit, except for SROs. In the "high density residential zone," which is limited to areas that are well-served by transit facilities, the minimum parking requirement for buildings with four or more units is one space for every two units, higher than DC's current requirement for high density residential zones of one space for every three units or one space for every four units depending on the zoning designation. This is not an example of a city where they have eliminated minimum parking requirements for residential uses citywide.

For a large portion of the city, San Francisco has parking minimums which generally are higher than DC's current minimum parking requirements and cover a wide variety of uses. In San Francisco, OP's consultant notes only that they have removed minimum parking requirements for multi-family dwelling buildings and only in the downtown or central business district areas. In fact, Section 151 of the San Francisco zoning regulations includes a "schedule of required off-street parking spaces. That table requires one space per dwelling, except in specific zones and certain uses. The exceptions to the one space per dwelling are quite limited, with a requirement of one space for every four dwelling units in RC-4 and RSD districts, no minimum in DTR and C-3 districts and a reduction (to one-fifth of the normal minimum requirement) for buildings specifically designed for senior citizens or physically handicapped persons. The regulations also define minimums for group housing and SROs, as well as a long list of other uses, including hotels, hospitals, schools, churches and institutions, and various commercial uses. Again, this is not an example of a city where they have eliminated minimum parking requirements for residential uses citywide.

DC's Current Minimum Parking Requirements for Residential Uses are Well Below DC's Vehicle Ownership Rates

More importantly, our current minimum parking requirements are already far lower than the current levels of vehicle ownership in the District. The following chart shows the District's minimum parking requirements as well as the number of vehicles per household from 2004 through 2006 for all households, households in owner-occupied units and households in rental units.



In criticizing minimum parking requirements, the OP report seems to rely on general comments about minimum parking requirements in other jurisdictions. OP has not looked at DC’s minimum parking requirements and other relevant factors such as the number of vehicles per household in DC. In fact, DC’s current minimum parking requirements are far lower than the minimum parking requirements for other jurisdictions, including many of the jurisdictions cited in the “best practices” descriptions.

While OP presents a chart that shows that the total number of vehicles owned by District residents has largely been unchanged since 1990, they did not consider the number of vehicles per households and how that compares with the minimum parking requirements per housing unit.

Shifting Costs from New Residents to Existing Residents by Providing Inadequate Parking in New Construction is not the way to increase housing affordability

Housing Costs: Should we reduce housing costs to new residents by imposing costs on existing DC residents? The discussion of housing costs⁶ seems to imply that, in order to reduce the cost of apartments and condominiums, we should reduce the amount of parking available to new residents, thereby imposing costs on existing residents and homeowners in the nearby lower density neighborhoods, where those additional vehicles will be parked.

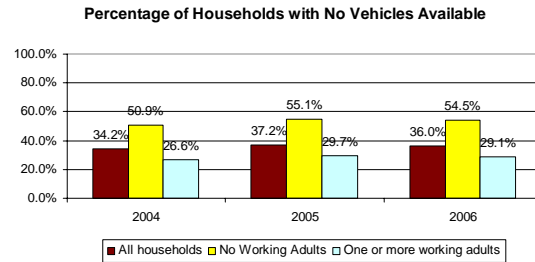
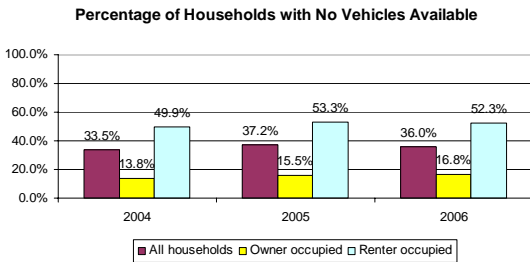
Inadequate parking in new development imposes costs on existing residents by increasing neighborhood traffic and pollution and diminishing safety as well as reducing on-street parking availability: Eliminating minimum parking requirements and inadequate off-street parking for new development causes safety concerns, increases traffic on neighborhoods streets and increases pollution in the neighborhood.⁷ While OP cites an example where a developer was not able to rent all the available parking to renters in a building, they did not provide any information on how many vehicles the tenants of that building will own and whether they will instead use on-street parking to save the cost of a off-street parking space.

⁶ Office of Planning, Report to the Zoning Commission, July 15, 2008, pages 6-7.

⁷ See, for example, “Gone Parkin’,” New York Times Op-Ed piece by Donald Shoup, March 29, 2007, citing the traffic and pollution associated with cruising for curb parking. This traffic and pollution spills over into the residential streets when new higher density residential and commercial development does not provide adequate parking.

Metro is a Commuter System and Cannot Replace Vehicle Ownership for Many Households

Metro is a commuter system⁸ and is very efficient at bringing commuters from some residential areas to DC’s downtown employment core and some other employment centers in the District, Virginian and Maryland. However, it is less efficient as a substitute for private vehicles for many other trips. In addition, many rush hour trains are already full to capacity as they reach the first District stations, and the suburban jurisdictions have significant increases in housing near the Metro in the pipeline. There are limits to how WMATA can address capacity, and it becomes more difficult for DC commuters to rely on rush hour Metrorail service. For some commuters, those whose jobs involve odd hours, those who need to drop their children off at day care on the way to work, those with jobs in remote locations, or who need to carry tools or supplies to their job-site, Metro is not a good alternative to a private vehicle. Also, those individuals, cited by CSG, who live within a quarter-mile of a bus stop, might face a very difficult commute by public transportation, with infrequent bus service, a need to change to another bus or rail, and a long walk, twice a day, and wait even in inclement weather.



And, DC households use transportation for other purposes, such as visiting friends and family members who might be on a different bus or rail line, taking children to multiple activities, weekly grocery shopping for a large family, caring for sick or elderly relatives, carrying bundles or doing multiple errands in one trip. Many of these households apparently find that access to a private vehicle is desirable.

OP has provided nothing to indicate that the number of vehicles per household is likely to diminish significantly as a result of these changes or that the number of households with no vehicles is likely to increase. In fact, given that our transportation system has been described as a commuter system and is used extensively for that purpose, it seems that a large percentage of households 64% of households find that they need a vehicle for other purposes or for a commute that involving hours or locations for which our transportation system is not an attractive option.⁹

⁸ See, for example, Coalition for Smarter Growth, July 10, 2008, letter, at page 3, stating: “Metro is widely regarded as one of the best commuter rail systems in the country and even those who do not live near a Metro station are almost certain to have at least one bus stop within a ¼ mile.”

⁹ The data on vehicle ownership shows that even though there are a substantial percentage of DC households, approximately 36%, which do not own a private vehicle, DC households own approximately 1.27 vehicles per household. The percentage of households with no working adults that do not have a private vehicle is nearly twice the percentage of households with one or more working adults that have no vehicles. Renters are more likely than owner-occupants to have no vehicles. More than half the households with no working adults have no vehicles and more than half the renters have no vehicles.

Other Erroneous Statements and Mischaracterizations of DC Zoning Regulations

- The OP report states “Parking standards today prescribe a one-to-one ratio for residential development...” Is OP implying that the current minimum requirement is a one-to-one ratio for residential development? In fact, the zoning regulations have much lower minimum requirement. There is a one-to-one ratio for single family residences and for residences in an R-5-A or C-1 district, but the minimum for multi-dwelling unit buildings in all other districts is much lower, ranging from 1 space for every two units to one space for every four units.
- OP begins its analysis of minimum parking requirements by claiming that they “tend to require more parking than is needed to accommodate average daily demand.” This premise, on which all the impacts are based, has not been demonstrated and in many instances is clearly false.
- OP states that “the recommended framework therefore emphasizes removing all minimum parking requirements except in circumstances where on-street parking management is anticipated to remain constrained, or for uses for which there is a history of public sensitivity to parking “overspill” conditions. However, the radical proposal to eliminate all minimum parking requirements for residential uses, as well as many other minimum parking requirements does not do this. Clearly, higher density housing with inadequate parking will have a spillover effect on lower-density residential neighborhoods, and OP and DDOT have not developed on-street parking management systems that could address that problem. Clearly, this will have an impact, and the zoning regulations shouldn’t be changed to create a problem for which no credible solution has been proposed. And, once buildings have been constructed with inadequate parking, it is too late to put the necessary parking in.
- In addition, some of the impacts of “excess off-street parking” are false. Putting aside the fact that OP has not demonstrated that current minimum parking requirements create “excess off-street parking,” the following claimed impacts would not follow:
 1. OP states that it “precludes or limits development on small parcels,” and yet many of the minimum parking requirements would not apply to small projects, or the requirement would be small enough that they could easily be met on-site, or possibly off-site. In addition, if this remained a concern, it would not be necessary to eliminate minimum parking requirements to address this concern. Minimum parking requirements could carefully crafted to address this concern directly.
 2. OP states that is “makes certain construction types infeasible, significantly increasing the costs of development.” It appears as though, in order to keep the costs of development low, OP will shift the cost of providing parking from the developer to the nearby neighborhoods, even though one of the fundamental goals identified by the Mayor’s Parking Taskforce is that “the priority user for parking in residential neighborhoods in the District is the neighborhood residents.” In addition, if there are certain construction types where it would be difficult to provide the parking on-site, there are or can be provisions for off-site provision of off-street parking as well as the sharing of required parking if the uses in question would qualify.
 3. OP states that it “may result in discontinuous retail frontages, as curb cuts and driveways replace storefronts to provide parking access,” that it “creates barriers to high-quality urban design by creating gaps within corridors,” and that “result(s) in further walking and driving distances.” With much of the off-street parking accessed through alleys or side streets, providing the parking that will be used by residents, employees, customers, and clients of project should

not create discontinuous retail frontages. Given that parking for many projects would be below grade, it isn't clear how it would be creating gaps within corridors. Is OP assuming that the parking will all be surface parking? On the other hand, for a large project, if below grade parking is not provided when the building is constructed, the impact is clear, with the vehicles that would otherwise be parked on-site, scattered through the neighborhood, increasing the walking distances to reach that destination as well as the existing homes and businesses.

4. OP states that it "increases the cost of housing units," and that it "hid(es) the costs of parking in the cost of housing, goods, and services." The concern about hiding the cost of parking in the cost of housing, goods and services is inappropriate. First, for housing, with the minimum parking requirements below one space per dwelling unit, it would be impossible to require that developers bundle parking with housing units, so the minimum parking requirement cannot directly result in hiding the cost of parking in housing costs. For other businesses, the cost of having adequate parking is a cost of doing business as any other. The proposal to eliminate minimum parking requirements, and encourage customers to use on-street parking in neighborhoods, as would be done with the Nelson/Nygaard proposals "manage curbside parking" to encourage turnover on residential streets so that spaces would be available to the local businesses, instead hides the cost of parking. Having businesses use neighborhood streets as parking lots for commercial development, rather than provide the necessary parking, imposes costs on our neighborhoods. Rather than protecting the neighborhoods, as required by the Comprehensive Plan, the proposals would encourage increased traffic on neighborhood streets, parking turnover, increased pollution and spillover parking.

Sincerely,

Marilyn J. Simon
Washington, DC.

Attachment: Comments on Draft Vehicle Parking Chapter, Marilyn J. Simon, April 15, 2008