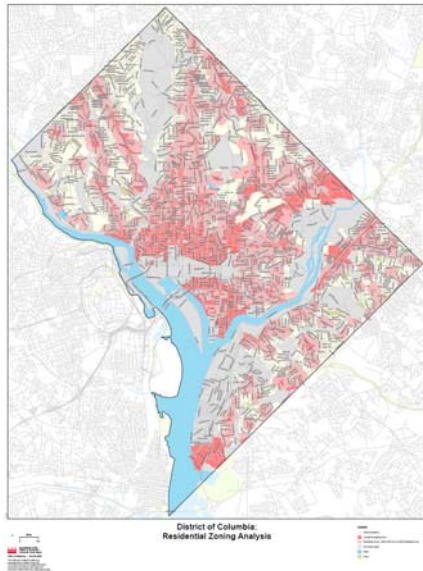


CASE NO. 08-06-2
 Comprehensive Zoning Regulations Rewrite: Parking
 Testimony of Marilyn J. Simon, Friendship Neighborhood Association
 Thursday, July 31, 2008

My name is Marilyn Simon, and I will be speaking on behalf of Friendship Neighborhood Association. The Office of Planning is recommending sweeping changes in the parking regulations, but in recommending the elimination of most minimum parking requirements, OP has ignored the basis for minimum parking requirements: to protect the District’s neighborhoods from spillover parking.

However, the issue of spillover parking cannot be ignored. OP’s proposal to eliminate entirely DC’s low minimum parking requirements will affect a large number of DC neighborhoods, and a large number of households.

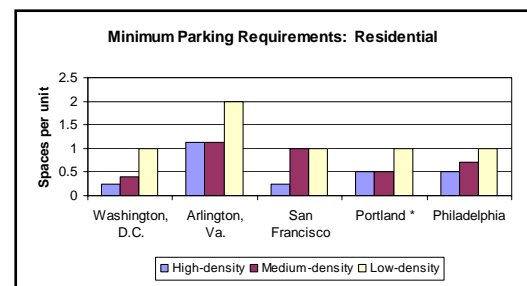


I have submitted a map which shows the low- and moderate density neighborhoods that will be affected by OP’s elimination of minimum parking requirements. Those areas are shown in pink. The pink areas actually underrepresent the percentage of households affected, since the density in those areas tends to be higher than the density in the rest of the low- and moderate density residential zone.¹

This will impact a large number of households, and we cannot, as OP suggests, simply eliminate minimum parking requirements, and then address the spillover problems that we cause later. Existing spillover issues have been well-documented in DDOT studies and it is a recurrent theme in the 2006 Comprehensive Plan.

OP has provided no basis for eliminating minimum parking requirements.

OP has called their recommendation “progressive” and “best practices,” but a review of the parking regulations in the other jurisdictions cited in OP’s studies shows that those jurisdictions, including several such as Portland and San Francisco that were mentioned tonight, have, at most, eliminated only some minimum parking requirements and only in very limited geographic areas, usually only the downtown employment zone. Most of those jurisdictions have minimum parking requirements that are equal to or exceed DC’s current minimum parking requirements. In fact, for Arlington, Virginia, there is a



¹ The areas in light pink are those areas in low- and moderate-density residential zones where OP’s proposal to eliminate most minimum parking requirements will result in increased exposure to spillover parking. These areas are within 800 feet of a zone where OP is recommending elimination of minimum parking requirements for some uses. §2104.1 provides that a 25% reduction in the parking requirement based on proximity to Metro for buildings that are at least 800 feet from an R-1, R-2, R-3 or R-4 zone.

minimum parking requirement of 1 space per unit or higher for residential uses, even residential uses near the Metro stations. Arlington’s minimum parking requirement for residential uses is two to four times

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

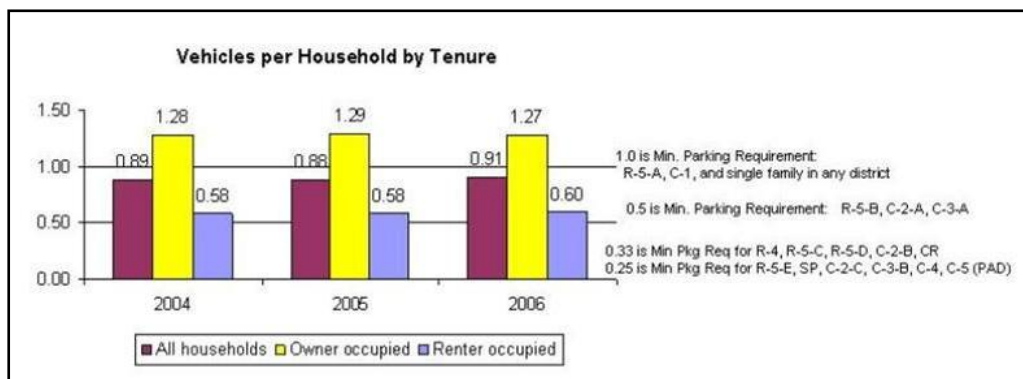
	Comparison with Current DC Zoning Regulations
Arlington, Virginia	Minimum Parking Requirement for Residential Uses: All Zones: 2-4 times the current DC minimums
San Francisco	Minimum Parking Requirement for Residential Uses: Medium density zones: 2 times DC minimums Low- and high density zones: same 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

DC’s current minimum parking requirement. My July 28 letter includes a chart and table comparing the DC’s current minimum parking requirements for residential uses with those of other jurisdictions that OP has cited. Since none of the cities listed in OP’s report have adopted policies as radical as OP’s proposal, it is difficult to see

how this can be considered “best practices.” Also, to the extent that these cities have adopted even a limited elimination of some minimum parking requirements, OP has presented no evaluation of those programs to show that the policy had the desired effect.

To justify the elimination of minimum parking requirements, OP points to other jurisdictions that might have set their minimum parking requirements too high. But OP has done no analysis of DC’s minimum parking requirements. Certainly, an observation that some other jurisdictions might have used the wrong data to set their minimum requirements would not justify a recommendation to eliminate most of DC’s minimum parking requirements.

In fact, for residential uses, DC’s current regulations set the minimum parking requirements well below the current level of vehicle ownership per household in DC. But, OP did not include information on vehicle ownership per household in their report, only the total number of vehicles.



Most importantly, OP seems to assume that if developers do not provide adequate off-street parking in new development, the residents will own fewer vehicles, rather than relying on on-street parking. A critical underlying assumption is that our city has a robust transportation system that can meet most of the needs of DC households. However, our transportation system is largely a commuter system, and is efficient at bringing commuters from some residential areas to DC’s downtown employment core. But, it is less effective as a substitute for private vehicles for other purposes, and it is absurd to assume

that many families living a quarter-mile from a bus stop will find that our transportation system is an efficient way to take children to their activities, shop and visit relatives and friends in other neighborhoods. For many DC families, access to a private vehicle is desirable, and OP has not presented evidence that our current vehicle ownership rates can be cut significantly. In my July 28 letter, I also addressed the other claims that OP has made about the impact of minimum parking requirements.

With respect to the requirement that developers provide spaces for car-sharing vehicles, we would suggest that, if such a requirement was found to be desirable, you might consider requiring developers to give a preference to a non-profit car-sharing company.

For these reasons among others, we ask that you not take any votes on these proposals. Guidance and direction might be useful, we think that a vote on these issues is premature.