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August 27, 2008

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Zoning Commission  
District of Columbia Office of Zoning  
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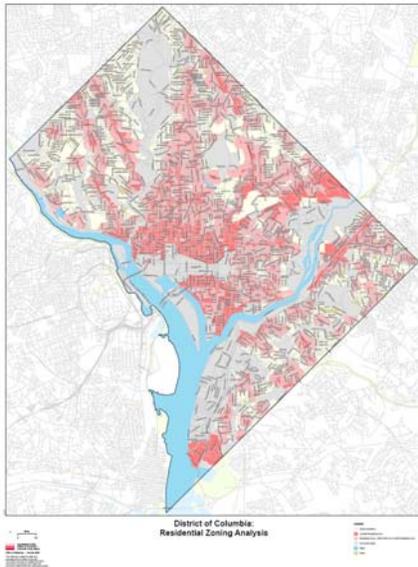
Re: Zoning Commission Case 08-06-2  
Proposed Amendments to the Parking Regulations 11 DCMR

Performance Parking

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### **Performance Parking: Relying on a Speculative, Unproven “Solution” to Deal with a Real Spillover Parking Problem**

It has been suggested that we can eliminate all minimum parking requirements for residential uses as well as most minimum parking requirements for other uses now, and deal with the impact later by establishing “performance-based parking areas.”<sup>1</sup>



First, OP’s proposed amendment to the parking regulations will create spillover parking problems in some neighborhoods and exacerbate existing spillover parking problems in other neighborhoods. Adoption of OP’s recommendations will create or exacerbate spillover parking problems in a large portion of the low- and moderate-density residential neighborhoods. Spillover parking is likely to increase in the low- and moderate density zones in light pink on the map. The sand-colored area is the remainder of low- and moderate-density zones—the portion of the low- and moderate-density residential areas that are more than 800 feet from a higher density areas where OP is proposing to eliminate minimum parking requirements.

Second, with such a large portion of the District’s low- and moderate-density neighborhoods at risk for additional spillover parking as a result of this proposal, it

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<sup>1</sup> Karina Ricks, DDOT, ZC Transcript, 08-06-2, July 31, 2008, page 28: “We are aware that there are concerns, notable that if sufficient parking is not provided off-street, then residents, workers or patrons will seek parking spaces on the local streets, the so-called spill-over effect. This is not an insignificant concern, but neither is it an unsolvable one. DDOT has already successfully piloted two performance-based parking areas, one in Columbia Heights and the other by the ballpark, as well as additional parking pilots in Wards 3 and 4. These pilots are shown tremendous promise in managing the demand of on-street spaces in both residential and commercial settings.”

David Alpert, ZC Transcript, 08-06-2, July 31, 2008, page 113: “The issue of spill over, which several people have raised, is a serious issue and we should definitely take steps to address it. But there are ways to do that and the Performance Parking Pilot, such as those that have been tried in the Columbia Heights area and in the Navy Yard National’s Ballpark area are the way to do that. Many cities have tried these policies like Pasadena, Portland, Boulder and many others and they have been very successful.”

Several other witnesses mentioned the ballpark parking program as a model for dealing with concerns about spillover parking in low- and moderate density residential neighborhoods.

seems imprudent to ignore concerns about spillover parking by relying on future implementation of “performance parking” policies, a group of policies which have not been defined, and which do not appear to address the issues that actually face many of D.C.’s neighborhoods today and will be exacerbated and expanded if this policy is implemented.

In describing these policies and claiming success, DDOT and proponents of OP’s proposal have mentioned the performance-based parking pilot at the Ballpark and in Columbia Heights, as well as the “success” of programs in Pasadena, Portland and Boulder. None of these performance parking programs have dealt with the spillover parking issues that many neighborhoods currently face, and which will be exacerbated with the development of higher density residential buildings with no minimum parking requirements. Several of these deal with the management of both on-street parking and parking in large, municipal lots or structures. Others deal with increasing the cost of parking for special events.

- **Ballpark Performance Parking Pilot Zone:** This program, which includes meters for curbside parking spaces and an enhanced RPP program, is designed to deal with a small number of large special events. While some neighborhoods do have spillover parking issues related to special events, that is not typical of the most severe spillover parking issues faced by D.C.’s neighborhoods. The type of spillover parking issues that most D.C. neighborhood currently face, and which will be exacerbated by OP’s proposal cannot be readily solved by this type of program. For many neighborhoods, there are more vehicles which have RPPs than there are available on-street parking spaces, and this will be exacerbated with the addition of higher density uses, particularly higher density residential uses, if those buildings do not provide adequate parking for their residents, workers and guests.
- **Columbia Heights:** According to the DDOT web-site, they have not yet developed the information on the proposed Columbia Heights Performance Parking Pilot. However, the “Performance Parking Pilot Zone Emergency Act of 2008” outlines the goals and targets as well as the actions that might be used. In the Columbia Heights Retail Performance Parking Pilot Zone, there will be signs installed on all residential streets in the zone and other approaches to the municipal parking garage, signs to direct traffic toward the off-street parking within the retail complex on the west side of the 3100 block of 14th Street, NW. Since most neighborhoods with spillover parking problems do not have a large underutilized municipal or public garage in the area, this pilot cannot serve as a general model to solve spillover parking issues in other neighborhoods.
- **Pasadena:** The Pasadena performance parking program deals with special events, such as the Rose Bowl, optimizing the rates for the public garages. The schedule of rates includes free parking with validation at some garages, monthly parking rates, hourly rates, time limits in some areas to encourage turnover, and very high rates for special events. Pasadena does not allow street parking between 2 a.m. and 6 a.m. except where posted otherwise, so most residents must make off-street arrangements for overnight parking.
- **Portland:** Portland uses a SmartMeter technology, which is a solar powered multi-space parking meter, and has a SmartMeter Parking Card available, which operates much like a Metro SmartTrip or an EZPass. They also have a permit program for citizens who live or work in non-metered areas. Vehicles cannot be left on the street for 24 hours: “All vehicles must be driven off the block face daily. Private, legal parking must be obtained if a vehicle is not driven daily.”

- Boulder: Boulder's performance parking program includes pay stations, which accept credit cards, for on-street parking, and management of municipal garages. There is an increase in the hourly rate after four hours in some garages. Boulder also has a neighborhood parking permit program, with eight neighborhood parking permit zones, for small areas ranging from several block faces to about 20 blocks. Vehicles without a permit may park only one time in the area on any day up to the initial time limitation. Vehicles with a permit are exempted from the posted parking restrictions. The fee for a permit is \$17 a year fee for residents. Boulder also sells on-street parking permits to businesses for use by its employees for \$75 a year per permit, and will allow larger businesses to purchase more than three permits. In addition, there is a limited supply of on-street parking permits sold to non-resident commuters for \$78 per quarter.<sup>2</sup>

None of the models mentioned by DDOT or other witnesses deal with the spillover issues currently faced by many District neighborhoods. Spillover parking reduces the quality of life in DC's low- and moderate-density neighborhoods, and increases traffic and pollution in those neighborhoods. Yet, with OP's proposal, these spillover problems will be exacerbated in those District neighborhoods which currently have spillover problems, and more neighborhoods will face parking spillover issues, as this proposal will encourage the construction of new development near low- and moderate-density neighborhoods with inadequate parking, as developers realize that they can rely on the neighborhood streets to meet some or all of their residents, guests and employees' needs.

Sincerely,

Marilyn J. Simon

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<sup>2</sup> Presentation by Jason Schrieber of Nelson/Nygaard, February 6, 2008, updated using the current fees posted on the City of Boulder Official Web Site. The commuter permits subsidize the residential permits. A map of the NPP zones is available at: <http://www.bouldercolorado.gov/flash/departments/DUHMD/parkingmap.swf>