

5241 43rd Street, NW  
Washington, D.C. 20015  
December 18, 2010

Mr. Anthony Hood  
Chair, D.C. Zoning Commission  
441 4th Street, N.W.  
Washington, D.C. 20001

Re: ZC Case No. 08-06 B-15, ZRR-Parking

Dear Chairman Hood and Zoning Commission Members,

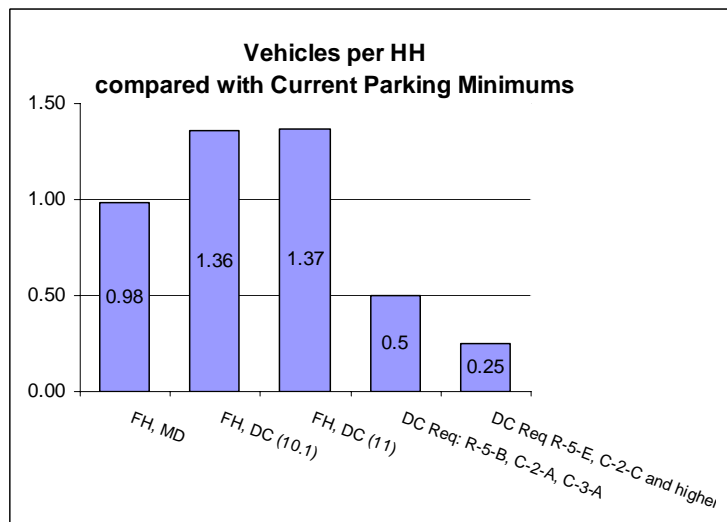
I am writing in opposition to OP’s recommendation to eliminate minimum parking requirements in the areas near transit.

In the attached letter to the editor, I note that our zoning regulations should not be changed based on an unrealistic expectation that future residents will own fewer vehicles or none at all. In this cover letter, I also provide some census data that demonstrates that OP’s assumptions are unrealistic and that spillover parking in nearby low and moderate density neighborhoods will result from the proposed elimination of minimum parking requirements. This is contrary to the purpose of “stabilizing residential areas and promoting a suitable environment for family life.”

OP’s recommendation to eliminate minimum parking requirements is based on unrealistic expectations about vehicle ownership and use:

**Vehicles per household:** The following data demonstrates that OP’s underlying assumptions in its proposals to eliminate minimum parking requirements for areas near transit are unrealistic. If the Zoning Commission accepts the proposed elimination of these minimum parking requirements and imposition of maximum parking limits, the result will be more spillover parking in nearby low and moderate density residential neighborhoods with an associated negative impact on the quality of life in those neighborhoods.

In a nearby high-density, mixed use neighborhood with Metrorail, Metrobus, Ride-On and free shuttle service, there is an average of nearly one vehicle per household.



The chart above compares vehicle ownership for Friendship Heights, Maryland with vehicle ownership in the two census tracts in Friendship Heights, D.C.<sup>1</sup> The last two observations are the our current minimum parking requirement, one space for every two units in zones R-5-B, C-2-A and C-2-B, and one space for every four units in high density zones, R-5-E, C-2-C and higher.<sup>2</sup> This chart demonstrates that our current minimum parking requirements are significantly lower than actual vehicle ownership rates in high density apartment zones with superior services near transit.

The chart compares our current requirements with an area where car ownership rates are likely to be lower than what we will actually observe in DC neighborhoods outside the central district. The demographics and additional services in Friendship Heights, Maryland mean that Friendship Heights, Maryland presents an overly optimistic picture of vehicle ownership for D.C.'s neighborhoods near Metro and vehicle ownership rates in D.C.'s TOD areas are unlikely to be at or below those in Friendship Heights Maryland.

Friendship Heights, Maryland is an area where 89% of the residents live in apartments or condominiums, nearly all of those in buildings with 50 or more units.

- Unlike the areas where OP would be eliminating parking minimums, there is a free shuttle bus serving the community, running 7 days a week (6:40 am to 9:40 pm on weekdays, and 8 am to 7 pm on weekends and holidays), which stops at every apartment building, two shopping centers, the Community Center, the County Recreation Center, the Metro, Whole Foods and Giant.<sup>3</sup>



(The photograph above shows the free shuttle bus at the local Giant supermarket.)

- Unlike many TOD neighborhoods in D.C., over 17% of the households have a head of household over the age of 75.<sup>4</sup>

Thus, the vehicle ownership rates shown are likely to be significantly lower than one might anticipate for the apartment buildings and condominiums in D.C. where OP is proposing to eliminate minimum parking requirements. For these reasons, it would be very optimistic to assume that D.C. will see, even near Metro, vehicle ownership rates this low outside the central core. Yet, there are, on average, 0.98 vehicle per occupied housing unit, a vehicle ownership rate four times our current minimum parking requirement for similar zones.

<sup>1</sup> Data is from the Census Bureau's 2005-2009 American Community Survey, 5 year estimates, available at [www.census.gov/acs/www/](http://www.census.gov/acs/www/). The data for Friendship Heights, Maryland is census tract 7056/02, and the data for Friendship Heights, DC is census tracts 10.1 and 11. The DC neighborhoods have more single family homes.

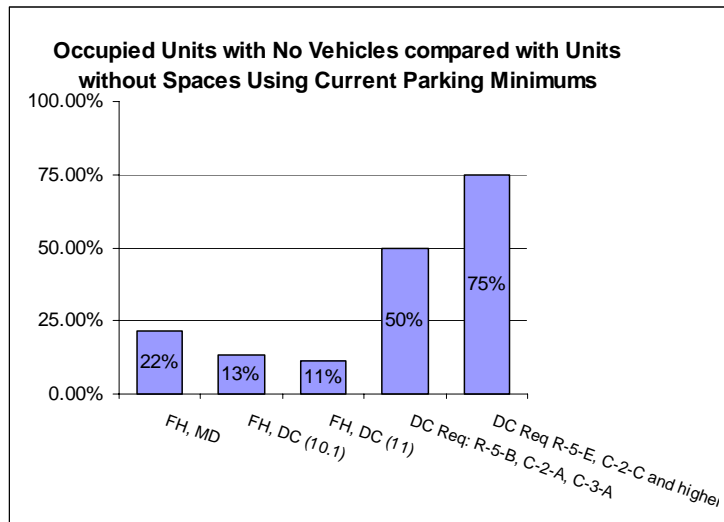
<sup>2</sup> The requirement for the other zones that allow apartments are one space for every three units.

<sup>3</sup> There are also three ZipCars in the area.

<sup>4</sup> Less than 12% of the owner-occupied units had no vehicle, and for owner-occupied units, 69% of the households with no vehicle had a head of household who was 65 years or older. Households in rental units were more likely not to own a vehicle, with the percentage higher for older residents.

**Percentage of households no vehicles:** The following chart compares the percentage of occupied housing units with no vehicles in each of these three areas with the number of housing units that will not have off-street parking available if a developer only provides the amount of parking currently required, and if no household uses more than one space.

Most households (over 78%) in apartment and mixed use zones outside the central district will own a vehicle.



In a nearby high-density, mixed use neighborhood with Metrorail, Metrobus, Ride-On and free shuttle service, 78% of the households have at least one private vehicle.

Only 22% of the households are car-free.

**Conclusion:** Examination of data for a high-density mixed-use community (with frequent free shuttle service, superior transit including Metrorail and Metrobus, access to a large number of shops and community services, and a large number of older residents) informs us about the likelihood that D.C. neighborhoods will have relatively low vehicle ownership rates and high percentages of car-less households as compared with our current minimum parking requirements. The evidence clearly demonstrates that, even if the vehicles are driven less than in some other neighborhoods, vehicle ownership is likely to exceed our current parking minimums.

In fact, an examination of this data indicates that developers who provide only the current minimum required parking would be accommodating less than half of the actual parking needs, and the remainder of the vehicles would spillover onto nearby low and moderate density streets.

Yet, the data from Friendship Heights, Maryland does not account for conditions in DC's neighborhoods. D.C.'s neighborhoods lack the services available there. It is unlikely that residents of these new D.C. buildings will actually have lower vehicle ownership rates than the residents of Friendship Heights, Maryland even if on-site parking was reduced or eliminated. Instead, if the developer does not provide adequate off-street parking, the new residents and their guests will use the RPPs and VPPs that DDOT will issue them, and park on the street in nearby low and moderate density neighborhoods, leaving the residents of those neighborhoods with less access to parking near their homes.

Sincerely,

Marilyn J. Simon

## Attachment 1:

**THE CURRENT****WEDNESDAY, DECEMBER 8, 2010 9****LETTERS TO  
THE EDITOR****Parking minimums  
protect quality of life**

The D.C. Office of Planning is proposing eliminating parking minimums in many areas, and it recently released a map of those areas. Parking minimums mitigate parking spillover problems that can affect the quality of life in our neighborhoods.

The Office of Planning repeatedly assured the Zoning Commission that off-street parking minimums would be retained in areas where a potential spillover effect exists, but this is not the case. The office recommends eliminating parking minimums near many single-family and row-house neighborhoods, including areas that have significant spillover problems.

The Office of Planning claimed that the D.C. Department of Transportation has tools to mitigate the impact of this recommendation. Yet the tools presented mainly involve residential parking permits and do nothing to mitigate the impact of eliminating parking minimums or address existing spillover.

Further, the Transportation Department representative clearly stated that residents of new apartment buildings — the very buildings that would not be required to provide adequate parking for residents, employees or guests — will be eligible for residential parking permits and visitor parking permits.

This means that, rather than having the developer provide sufficient off-street parking, apartment dwellers will rely on the already-crowded streets of nearby neighborhoods, leaving the residents there to either pave their small back yards or park farther from their homes.

Many of D.C.'s successful transit-oriented neighborhoods lie near areas where planners propose to eliminate parking minimums. These are walkable low-density neighborhoods, near transit, where many residents use transit for commuting, but also rely on cars for other transportation needs. Many of the houses lack adequate off-street parking, and those residents rely on on-street parking. Neighborhoods such as Friendship Heights, Tenleytown and Cleveland Park already have tight on-street parking conditions, as neighborhood streets are shared by residents, shoppers, local business employees and commuters who drive to Metro. As a result, residents frequently find it difficult to park near their homes.

Current parking minimums are the lowest in the area and are far below the actual vehicle ownership for residential buildings. Currently,

only one space for every two to four apartments (depending on the zone) is required. Because of this, spillover parking in many single-family neighborhoods near apartment and mixed-use zones is evident.

Regulations should not be changed based on an unrealistic expectation that future residents will own fewer vehicles or none at all. The District's transportation system is efficient at carrying commuters to the employment core, but for many households it is not robust enough to meet most transportation needs.

On Jan. 10, the Zoning Commission will consider the Office of Planning's proposal. The record (ZC Case 08-06) will remain open for written comments until Dec. 20 at 3 p.m.

**Marilyn Simon**  
*Friendship Heights*