

STAFF RECOMMENDATION



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NCPC File No. ZC 08-06-2

PROPOSED RULEMAKING
DISTRICT OF COLUMBIA COMPREHENSIVE ZONING REGULATIONS REWRITE:
CHAPTER B15 – MOTOR VEHICLE PARKING
CHAPTER B16 - BICYCLE PARKING
CHAPTER B17 - LOADING

Washington, DC

Submitted by the Zoning Commission of the District of Columbia

January 27, 2011

Abstract

The District of Columbia has undertaken a comprehensive review of its Zoning Regulations, which have not been updated since 1958. The citywide regulations on motor vehicle parking, bicycle parking, and loading are three of the many subject areas included in the city's ongoing review. Currently, the standards are divided between multiple sections, which has led to confusion, and do not adequately reflect the recently updated District Comprehensive Plan. The District of Columbia Office of Planning (DCOP) has analyzed national best practices; hosted public meetings; and sponsored a task force to develop a set of simplified, relevant, and easier-to-use proposed regulations. The new proposed zoning regulations reflect the District's effort to develop a transportation network that provides more transportation choices; more land-efficient development in support of non-automobile transportation modes; and more efficient, sustainable use of the City's parking supply and transportation system.

Commission Action Requested by Applicant

Approval of report to the Zoning Commission of the District of Columbia pursuant to 40 U.S.C. § 8724(a) and DC Code § 2-1006 (a).

Executive Director's Recommendation

The Commission:

- **Advises** the Zoning Commission that the proposed language establishing new citywide motor vehicle parking, bicycle parking, and loading regulations as described in the rulemaking will not adversely affect the 2004 Comprehensive Plan for the National Capital: Federal Elements or any other federal interests.
- **Commends** the District on developing citywide parking and loading regulations that are consistent with federal policies contained in the 2004 Comprehensive Plan for the National Capital: Federal Elements and 2009 Monumental Core Framework Plan.
- **Notes** that there are several citywide zoning regulations contained in the "Maximum Parking Requirements" (Section 1503) section, which are still under review by the District, and that these regulations are scheduled for submission to the District of Columbia Zoning Commission in Spring 2011, after which time they will be reviewed by NCPC.

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BACKGROUND

According to a 2008 DCOP background memorandum, the basic framework of the District's parking requirements was established based on recommendations from a 1956 report that concluded that streets:

"...were intended primarily for moving traffic and for access to abutting property. Unfortunately they were also being used, to a great extent, as garages for the storage of passenger cars. There is no longer any justification for this or for their use for the frequent parking of heavy trucks while loading or unloading merchandise. Space for each of these activities should be provided by the property owner off-street and in general on the lot where the building to be served is located."

This framework was subsequently codified in the District of Columbia Municipal Regulations (DCMR), Title 11, adopted in 1958 and still in use today.

Based on that report, existing parking requirements for non-residential development assume cars as the preferred mode of choice for transportation, and that parking will be provided ad infinitum. Existing District parking regulations seek to include the design of places as much for parking as for people, encouraging more traffic onto city streets in search of free and convenient parking. As such, the current standards fail to recognize the special qualities of thriving city neighborhoods that were well-established prior to the 1958 Code such as Capitol Hill,

Georgetown, and Kalorama. These neighborhoods are desirable because they are able to support less dependency on motor vehicles by providing more varied transportation choices compared to newer neighborhoods that were established after the 1958 regulations were adopted. Negative impacts from parking are readily seen where curb cuts and garage entries hinder bike and pedestrian activity in mixed-use neighborhoods, and degrade the quality of commercial areas.

There has in recent years been a general shift away from these earlier assumptions, guided by the “complete streets”¹ movement, to create better neighborhood designs and healthier cities. For example, contemporary management of public space acknowledges curbside parking as a necessary part of urban life, rather than viewing curbside lanes as an undesirable use of right-of-way. Furthermore, current technological innovations and operational practices now allow the District to mitigate “spillover” impacts through efficient management, which off-street parking requirements were originally enacted to address.

The District Comprehensive Plan was significantly revised in 2006 to reflect this more modern thinking by redirecting the vehicle-accommodating policies of the past through the following more contemporary strategies (repeated throughout the Plan):

- Developing and implementing programs to improve parking management strategies/ programs in the commercial and residential districts;
- Managing parking demand through shared parking;
- Reducing parking with TDM Strategies;
- Reducing the environmental and visual impacts of surface parking lots;
- Promoting the use of structured parking instead of surface lots;
- Limiting curb cuts and multiple vehicle access points;
- Unbundling parking costs.

The objectives of the ongoing parking and loading zoning regulations review are to develop standards that are clear, relevant, and easy-to-use, which reflect the overall intent of the 2006 District Comprehensive Plan to develop a transportation network that provides more transportation choices; more land-efficient development in support of non-automobile transportation modes; and more efficient, sustainable use of the its parking supply and transportation system.

Zoning Update Process

A comprehensive review of zoning regulations was identified as a goal in the 2006 *District Elements of the Comprehensive Plan for the National Capital*. The Zoning Review process officially began in 2007 with a pair of public roundtables before the Zoning Commission and the formation of a citywide task force. Since then, the District of Columbia Office of Planning (OP) has organized eighteen public working groups by subject area and held over 150 public meetings. NCPC staff attended many of these meetings. Each subject area has been reviewed in

¹ “Complete Streets” is a national movement to plan, design, and operate streets/roadways with all users in mind - including bicyclists, public transportation vehicles and riders, and pedestrians of all ages and abilities.

consultation with a public working group that discussed issues identified in the District Comprehensive Plan as well as issues arising from the existing Zoning Regulations.

Recommended changes were forwarded to the 24-member task force, appointed by City Council members, for further review and input. Finally, recommendations for most subject areas were made available for public review, including at least one public hearing before the Zoning Commission. After the conclusion of public review for each subject area, DCOP has been working with the Office of the Attorney General to draft zoning language to reflect the proposed policy changes.

DCOP used the proposed reorganization of the Zoning Regulations and the conceptual recommendations previously approved by the Zoning Commission as a framework for developing updated text for each section of the regulations. Each section of text will be reviewed by the Zoning Commission and heard at public hearings separately over the course of the next year. After text sections have been approved by the Zoning Commission, these separate text sections will be unified into a proposed set of zoning regulations that will be the subject of a final public review.

The existing citywide parking and loading regulations are contained in Title 11 (the Zoning Regulations) of the District of Columbia Municipal Regulations. The new proposed citywide parking and loading regulations will reside in Subtitle B (General Regulations), with the following organizational structure:

- Subtitle A - Administration and Procedures;
- Subtitle B - General Regulations²;
- Subtitle C - General Processes;
- Subtitles D to J - Land Use Requirements³;
- Subtitle M - Zoning Administrator's Interpretations.

NCPC has been meeting with DCOP over the past two years, as well as participating in public meetings regarding many of the proposed zoning regulation changes. Staff submitted a letter to the Zoning Commission related to the proposed citywide parking and loading regulation changes outlining NCPC comments on July 28, 2008. In this letter, NCPC outlined several topic areas including: Minimum Parking, Maximum Parking, Shared Parking, Car Sharing, Carpool Parking, "Unbundling" Parking and Housing Costs, Transportation Demand Management, Facility Design (Street Frontage, Porous Surfaces, Alley Access, Structured Parking), Bicycle Parking, and Loading. These topics are further elaborated in the letter, which is provided in Attachment A.

² The general, citywide parking and loading regulations contained in this section are the regulations that are currently under review.

³ These sections will contain parking regulations that apply on a zone-by-zone basis, including specific numeric standards associated with minimum and maximum parking levels. These will be submitted for review and comment by the Commission at a future date.

PROPOSED RULEMAKING

A DCOP setdown report, dated September 3, 2010, describes the existing citywide parking and loading zoning regulations contained in the DCMR, Title 11; significant issues with the existing regulations; and a framework for changes to update the current regulations. The following background summarizes the report and the proposed new chapters.

Existing Motor Vehicle Parking Regulations (DCMR, Title 11, Chapters 21 and 23)

The following issues described in the DCOP setdown report, specifically relate to the existing citywide motor vehicle parking zoning regulations and highlight the need to revise the standards.

1. Minimum Requirements

The existing zoning regulations require on-site parking for all uses in all zones, regardless of location within the city. Although exceptions are made for projects to reflect good transit accessibility by allowing fewer spaces than the required minimums on a case-by-case basis, current practice assumes that good transit accessibility deviates from the “normal” condition. This is not the case however, as 45 percent of District residents are located within ½ mile of a Metrorail station, and 96 percent are located within ¼ mile of a bus stop. Additionally, more than 50 percent of District residents utilize a travel mode other than a personal automobile when traveling between work and home, with 37 percent utilizing transit.

The current minimum parking requirements were originally implemented to protect curbside parking spaces from demand generated by the newly developed land uses in the 1950’s, designed to accommodate average daily demand rather than maximum demand levels, resulting in excessive on-site parking. History has since demonstrated the following negative impacts associated with overabundant off-street parking:

- Increased cost of construction and decreased affordability;
- Limited types of development on small parcels;
- Precluded adaptive reuse of existing buildings;
- Discontinuous retail frontages and pedestrian conflicts on sidewalks associated with curb cuts and driveways to access parking;
- Hidden costs of parking in the cost of housing, goods, and services;
- Encouraged reliance upon personal automobile travel, which generates traffic and congestion.

The proposed citywide parking regulations will remove or reduce minimum parking requirements except when on-street parking management is anticipated to remain constrained, or there is a history of public sensitivity to parking “overspill” conditions. Removing minimum parking requirements would not preclude the construction of parking, and DCOP anticipates that most development will continue to contain as much or more parking than our current regulations require for the foreseeable future. The District believes that the changes will lessen a large

number of parking-related variances where parking is difficult or impossible to provide in the short-term, and address many of the issues described above in the long-term.

2. Purpose and Organization

The existing District Code does not clearly specify the purpose of the parking regulations – an omission that is common to many of the regulatory topics covered by the Zoning Regulations. In some areas, the current parking regulations are organized in an illogical or confusing manner, making information difficult to access. For example, regulations that govern the size and layout of parking spaces logically belong together in a single section, rather than spread out among three different sections as is the case in the current regulations. The proposed new citywide regulations attempt to organize the standards for motor vehicle parking into a more logical and easy-to-use format.

3. Ensuring More Efficient Use of Parking

According to the DCOP setdown report, shared parking between different uses is virtually impossible with the current parking regulations, even though this would result in the use of existing parking capacity more efficiently, without the need to build excess and unused capacity. Current District regulations include no provisions to limit the amount of parking that developers may provide, which undermines the incentive for shared parking arrangements. The District believes that *over*-parking seriously undermines the City's efforts to promote a multimodal transportation system, develop blocks and neighborhoods that are walkable in scale, decrease runoff from impervious surfaces, and support affordable housing.

4. Car-Sharing

Current parking regulations recently acknowledged the expansion of car-sharing services in the District, and its impact on car ownership and parking demand.⁴ A recent Zoning Commission case⁵ serves as an interim measure to promote car-sharing without addressing some larger related issues. Holistically, car-sharing will reduce the number of new parking spaces needed around the city, and better support District policy to ensure that these services are accessible and usable throughout the city. As such, the proposed citywide motor vehicle standards more actively promote the location of car sharing spaces throughout the city.

5. Methods of Calculating Requirements

Parking requirements are currently calculated based on an array of factors, including:

- Gross floor area (GFA);
- GFA plus cellar area;

⁴ Researchers have estimated that each car-share vehicle removes 9-13 private automobiles from the streets.

⁵ Zoning Commission Case # 09-16 clarified permissions to set aside parking for car-share vehicles in Residential zones.

- Number of seats;
- Number of employees;
- Number of hospital beds;
- Number of sleeping rooms.

The DCOP setback report states that while each method of calculation may have valid reasons, most methods are based on factors that can be subject to constant change, and that - if administered precisely - would create unsustainable enforcement burdens. As such, the proposed citywide regulations attempt to simplify these standards.

6. Location and Access

Current motor vehicle parking regulations include limits on the location of parking spaces, but are not consistent with the District Comprehensive Plan which states that, “new parking should generally be set behind or underneath buildings.” Likewise, existing regulations that govern the location and width of driveways are inadequate to implement current District policies to limit the impact of curb cuts on streetscapes. In some instances, the Zoning Regulations standards contradict more recent regulations established in DDOT’s Design and Engineering Manual. Lastly, requirements for the size and layout of parking spaces are outdated and are contained in a series of subsections that make them difficult to locate and reference. As such, the proposed citywide standards are better organized, simpler to access, and more consistent with recently adopted DDOT and DCOP policies.

7. Screening and Landscaping

Existing motor vehicle regulations are inadequate related to lot screening and landscaping since they require only five percent of a surface lot’s area to be covered with landscaping. In addition, there are no standards set for tree planting, despite demonstrated environmental impacts from large impervious surfaces (including storm water runoff and the urban heat island effect). The proposed citywide regulations will increase the mandatory coverage area for surface lot landscaping, and more specifically list tree and plant species that are acceptable to use.

8. Exceptions

There are a number of exceptions to the current parking requirements, as well as criteria for receiving reductions or waivers of requirements through the special exception process. However, some of these criteria are outdated; for example, current regulations specify that the Board of Zoning Adjustment (BZA) may consider “ride-sharing programs” as a criterion for reducing the required parking, though there is no mention of the wider array of transportation demand management (TDM) strategies that are now widely deployed to reduce parking demand. The proposed general exception standards will more accurately reflect the more sophisticated transportation world of today, compared to the current dated standards from the late 1950’s.

Proposed Motor Vehicle Parking Regulations (DCMR, Subtitle B, Chapter 15)

The new citywide regulations are organized into 13 sections as shown in the following table.

Section	Title	General Rationale / Intent
1500	Introduction	Provides a clear introduction, statement of the purpose, and general direction to the Zoning Administrator.
1501	Relationship to the Land Use Subtitles	Explains the relationship of the General Parking Chapter to the Land Use Subtitles.
1502	General Requirements	Updates basic rules that govern the use of parking spaces, and revises regulations to accommodate car-sharing and shared parking. Combines a number of disparate requirements into a single section.
1503	Maximum Requirements	Establishes general parking maximums that apply city-wide, as well as rules for the operation of zone-specific parking maximums.
1504	Car Share Requirements	Implements car-share space requirements for large parking areas (w/ greater than 50 spaces).
1505	Rules of Calculation	All parking standards shall be calculated on the basis of <i>gross floor area</i> , except for Residential uses, for which parking standards shall be calculated based on the number of <i>dwelling units</i> . Standards are clearly defined, simple to calculate, and easy to check plans against.
1506	Location Restrictions	To prevent negative impacts on neighboring property from excessive parking, prevent conflicts between vehicles and pedestrians, respect the pedestrian environment, foster good urban design, and provide space for active uses to line parking structures. Makes requirements consistent with District Comprehensive Plan and Zoning Commission recommendations.
1507	Access Requirements	To ensure that <i>driveways</i> and entrances to parking areas provide safe access and do not degrade the pedestrian environment. Makes requirements consistent with DDOT regulations and Zoning Commission's recommendations.
1508	Size and Layout Requirements	To ensure that <i>parking spaces</i> are adequately sized to allow safe and convenient access, to allow mechanized parking, and to allow flexibility to meet parking needs for smaller motor vehicles. Updated to reflect industry practice.
1509	Maintenance Requirements	To ensure that <i>parking spaces</i> are constructed durably, that they are maintained over time, and that they do not create health or safety problems.
1510	Landscaping, Screening, and Lighting Requirements	To ensure that parking areas are compatible with their surroundings, and to reduce environmental impacts.
1511	Drive-Through Queuing Lanes	To prevent negative visual impacts or encroachments on the use of public space. Existing language was not modified.
1512	Exceptions	Establishes a single Exceptions section. Clarifies the application of exceptions for facilities that utilize attendant parking.
1513	Special Exceptions	Establishes a single Special Exceptions section. Simplifies the conditions for special exceptions, and updates them based on the other proposed parking recommendations and the District Comprehensive Plan.

DCOP propose the new citywide standards as easier to use and easier to locate, applicable to all Land Use Subtitles (D-J). In general, the regulations will minimize the provision of on-site parking in new/significantly-expanded development to help improve urban design, improve the natural environment, and to encourage alternative forms of travel. The current regulations are not as flexible and assume personal automobile travel as the mode of choice within the city, which is inconsistent with current District and federal government policies and goals.

Please note that some of the values within the “Maximum Requirements” section (Section 1503) are still in development by the District, and these regulations will be available for future public and NCPC review in Spring, 2011. The regulations are as follows:

- 1503.1 The following maximums apply to all newly constructed or expanded parking areas, or parking areas expanded in number of parking spaces or land area by twenty-five percent (25%) or more, in zones within subtitles D, E, G, and J; in addition to any parking maximums specified in the land use subtitles:
 - (a) No above-grade parking area shall be built or expanded to exceed one hundred thousand (100,000) square feet in land area;
 - (b) No parking area shall be built or expanded to have more than **[Reserved for parking numbers]** parking spaces; and
 - (c) No parking area associated with a use or uses shall be built or expanded to have **[Reserved for parking numbers]**:

- 1503.2 The following maximums apply to all newly constructed or expanded parking areas, or parking areas expanded in number of parking spaces or land area by twenty-five percent (25%) or more, in zones within subtitles F, H, and I; in addition to any parking maximums specified in the land use subtitles:
 - (a) No above-grade parking area shall be built or expanded to exceed one hundred thousand (100,000) square feet in land area;
 - (b) No parking area shall be built or expanded to have more than **[Reserved for parking numbers]** parking spaces; and
 - (c) No parking area associated with a use or uses shall be built or expanded to have **[Reserved for parking numbers]**:

Existing Bicycle Parking Regulations (DCMR, Title 11, Chapter 21)

The following issues described in the DCOP setdown report, specifically relate to the existing bicycle parking regulations and highlight the need to revise the standards.

1. Minimum Requirement

The 2006 District Comprehensive Plan directs the City to ensure that “automobile needs are balanced with transit, pedestrian, and bicycle travel needs.” The current Zoning Regulations balance the needs of bicycles and motor vehicles with a requirement that the number of bicycle spaces must equal at least five percent of the required number of motor vehicle spaces. In addition, this requirement is limited to office, retail, and service uses, only in certain zones. DCOP and DDOT have determined that the current requirements are insufficient to support the future desired level of bicycle usage through the 2005 District Bicycle Master Plan and 2006 District Comprehensive Plan.

In addition, the proposed motor vehicle regulations will reduce, or in some cases, completely eliminate minimum parking requirements, and as such, the number of bicycle spaces would be reduced/eliminated in these situations, which is contrary to District policies and goals. The proposed solution by the District is to adopt a citywide schedule of bicycle parking requirements that will be independent from motor vehicle parking requirements.

2. Parking Provision

Current bicycle standards that govern how bicycle parking is provided (e.g., dimensions, accessibility, and security requirements) are inadequate to ensure bicycle spaces that are usable, accessible, and secure. DDOT has published a Bicycle Facility Design Guide for Bicycle Facilities (2005) however, the guide is considered to be advisory only, and is only used to give direction to facilities located on public space under DDOT control. In the absence of clear standards, there are numerous parking facilities that were provided through private developments that are difficult to use and lack adequate security measures. The proposed citywide regulations will ensure that new bicycle facilities better perform their intended function in support of District policies and goals.

Proposed Bicycle Parking Regulations (DCMR, Subtitle B, Chapter 16)

The new citywide regulations are organized into eight sections as shown in the following table.

Section	Title	General Rationale / Intent
1600	Introduction	Provides a clear introduction, statement of the purpose, and general direction to the Zoning Administrator.
1601	Relationship to the Land Use Subtitles	Explains the relationship of the General Bicycle Parking Chapter to the Land Use Subtitles.
1602	General Requirements	To ensure that bicycle parking spaces are usable and accessible.
1603	Maximum Requirements	To ensure an adequate minimum number of bicycle spaces based on current “best practices”.
1604	Rules of Calculation	All bicycle parking standards shall be calculated on the basis of <i>gross floor area</i> , except for Residential uses, which base bicycle parking standards on the number of <i>dwelling units</i> . Standards are clearly defined, simple to calculate, and easy to check plans against.
1605	Short-Term Parking Requirements	Establishes regulations related to short-term parking requirements, ensuring that spaces are usable and accessible by short-term visitors.

1606	Long-Term Parking Requirements	Establishes regulations related to long-term parking requirements, ensuring that spaces are usable and accessible by longer-term users.
1607	Changing Facility Requirements	Establishes original section related to changing /shower facility requirements, to be provided for by larger uses, related to longer-term users.
1608	Special Exceptions	Establishes Special Exception Section related to bicycle-specific requirements.

DCOP proposes new citywide standards that are easier to use and locate, applicable to all Land Use Subtitles (D-J). In general, the regulations will promote bicycling as a more practical way to travel by workers, residents, and visitors. Current regulations are not as sophisticated, do not address potential barriers to bicycle travel such as a lack of readily-available showering/changing facilities, and do not recognize the differing needs of long-term and short-term parkers.

Existing Loading Regulations (DCMR, Title 11, Chapter 22)

The following issues described in the DCOP setdown report, specifically relate to the existing loading facility regulations and highlight the need to revise the standards.

1. Shared Facilities

The current zoning regulations fail to recognize that a variety of uses can locate within a building by requiring separate loading spaces for each individual use, with no provision for the sharing of spaces. When allowed, sharing of loading facilities can create efficiencies because each use may have critical delivery times which do not coincide. The proposed citywide loading regulations will better accommodate mixed-use buildings than the current regulations, which are applied to uses rather than properties.

2. Delivery Operations

The transportation of goods has changed significantly since the current loading regulations were drafted in the late 1950's, with different origins of the goods, greater use of transfer hubs, and larger parcel delivery industry. The size of housing units within the city has changed as well and as such, the type and size of trucks used in the transporting home goods (e.g. furniture) has changed. Lastly, the function of some uses have changed over the years such as supermarkets, which had traditionally focused on selling food only, and now often provide additional services such as flower shops and pharmacies. All of these economic changes have resulted in significantly different delivery operations than when the regulations were adopted, and the proposed standards are more accommodating and flexible to the services of today.

3. Streetscape Design

As with parking, entrances (curb cuts) into loading areas along the front of a building/site can diminish the streetscape. The negative effects of building front loading access are readily seen when curb cuts and loading area entries hinder pedestrian activity and degrade the quality of building façade along commercial corridors. As such, the proposed citywide regulations

prioritize loading access from alleys and secondary streets rather than primary streets, and place more stringent restrictions on the location of loading facilities to minimize their impacts on city streets.

Proposed Loading Regulations (DCMR, Subtitle B, Chapter 17)

The new citywide regulations are organized into 10 sections as shown in the following table.

Section	Title	General Rationale / Intent
1700	Introduction	Provides a clear introduction, statement of the purpose, and general direction to the Zoning Administrator.
1701	Relationship to the Land Use Subtitles	Explains the relationship of the General Loading Chapter to the Land Use Subtitles.
1702	General Requirements	Promotes the use of smaller trucks by eliminating the requirement to provide 55' berths, and allows shared facilities. Establishes consistent loading requirements for all zones.
1703	Rules of Measurement and Interpretation	To provide rules of measurement and interpretation that will be used to meet loading requirements, standards, and conditions.
1704	Location Restrictions	Places more stringent restrictions on the location of loading facilities. Ensures adequate screening and buffering for loading facilities in side yards.
1705	Access Requirements	To ensure that loading facilities are safe and accessible, and that driveways do not conflict with the pedestrian environment or with vehicular and bicycle traffic. Makes regulations consistent with 2006 District Comprehensive Plan, DDOT requirements, and Zoning Commission recommendations.
1706	Size & Layout Requirements	To ensure that loading facilities are adequately sized and capable of performing their intended functions.
1707	Maintenance Requirements	To ensure that facilities are maintained over time and are safe and clean.
1708	Trash Receptacle Requirements	To ensure that facilities for trash collection are provided and clearly shown on building plans.
1709	Screening and Lighting Requirements	To ensure that facilities are compatible with surroundings.
1710	Special Exceptions	Locates special exception requirements in a single unique section. Allows greater flexibility from the loading requirements citywide, and for historic resources.

DCOP proposes the new regulations as easier to use and easier to locate, applicable to all Land Use Subtitles (D-J). In general, the new zoning regulations will make future loading facilities more efficient, less impactful to adjacent properties, and allow more flexibility in their design to accommodate smaller delivery vehicles.

PROJECT ANALYSIS

Staff has reviewed the proposed citywide parking and loading zoning regulations, and finds that there are no federal interest concerns regarding the proposed text. Staff finds that DCOP has undertaken a thorough analysis of the issues, provided case studies on best practices, and used this knowledge to develop significantly improved parking and loading zoning regulations. The revised citywide regulations are more consistent with policies contained in the 2004 Comprehensive Plan for the National Capital: Federal Elements and 2009 Monumental Core Framework Plan, and will help to create a more livable, sustainable city that offers a broader range of travel options for workers, residents, and visitors.

In particular, the proposed citywide motor vehicle parking regulations are consistent with the following Comprehensive Plan and Monumental Core Framework Plan policies:

Comprehensive Plan - *Transportation Element*

- Position parking facilities so as not to obstruct pedestrian and bicycle access to buildings.
- Prepare Transportation Management Plans (TMPs) to encourage employee commuting by modes other than the single-occupant vehicle.
- Encourage ridesharing, biking, walking, and other non-single-occupant vehicle modes of transportation of federal commuters.

Comprehensive Plan - *Parks and Open Space Element*

- Discourage large paved parking areas and other non-water-related development along the Anacostia and Potomac Rivers. Where large paved areas are required, preference should be given to using pervious surfaces.
- Increase and conserve the tree canopy and landscape cover in urban areas of the region.

Comprehensive Plan - *Federal Environment Element*

- Encourage federal employees to rideshare, including the use of carpools, vanpools, privately leased buses, public transportation, and other multi-occupant modes of travel.
- Mobile sources of air pollutants should be reduced by further decreasing federal employee usage of single-occupant vehicles through operational policies, such as Transportation Demand Management techniques, and the location and design of workplace facilities.

Comprehensive Plan - *Preservation and Historic Features Element*

- Encourage the practice of good design principles throughout the region to continually strengthen the image of the nation's capital.

Monumental Core Framework Plan

- Encourage environmentally sustainable transportation alternatives to minimize harmful emissions and increase transit choices. Even a robust public transportation system will not eliminate private vehicles and associated carbon emissions. Private vehicle use can be minimized by managing parking capacity, as proposed by the District, and by increasing car sharing and transit availability.
- Design great streets to safely accommodate all users equally—including pedestrians, bicyclists, transit riders, and motorists—in a beautiful setting. This involves providing inviting and continuously accessible sidewalks, reducing curb cuts, incorporating transit infrastructure, employing traffic-calming measures, and reducing conflicts between pedestrians and vehicles.

The proposed citywide bicycle parking regulations are consistent with the following Comprehensive Plan for the National Capital: Federal Elements and Monumental Core Framework Plan policies:

Comprehensive Plan - *Transportation Element*

- In order to encourage greater bike ridership, provide secure and sheltered bicycle parking spaces or bicycle lockers in close proximity to building entrances at federal buildings and on federal campuses. The number of spaces provided should be in accordance with the requirements of the local jurisdiction in which the federal facility resides, if such requirements exist. In the absence of such requirements, federal facilities should provide an abundant supply of bicycle lockers or parking spaces to meet current employee needs and to promote bicycle commuting.
- Encourage ridesharing, biking, walking, and other non-single-occupant vehicle modes of transportation of federal commuters.
- In order to encourage greater bike ridership, provide employee clothes lockers and showers at federal buildings and on federal campuses to support bicycle commuters. Space should be reserved in new facilities to allow for the provision of showers and lockers to support the bicycle commuting population. Specific goals for bicycle parking should be outlined in the TMP, keeping in mind that visitors may also arrive by bicycle.

Comprehensive Plan - *Federal Environment Element*

- Encourage federal employees to rideshare, including the use of carpools, vanpools, privately leased buses, public transportation, and other multi-occupant modes of travel.

Comprehensive Plan - *Visitors Element*

- Encourage increased use of bicycles to access attractions in the region, and provide bicycle racks, information about rental locations, and maps identifying designated bike path locations.

Monumental Core Framework Plan

- Promote bicycle use to increase mobility and reduce dependence on motor vehicles. One of the healthiest and most sustainable modes of transportation is riding a bicycle. As described in its 2005 Bicycle Master Plan, the District promotes safe and convenient bicycle use throughout the city. The most recent contribution to this effort is the SmartBike system of short-term bicycle sharing. To improve and increase use, convenience, and safety, the existing network of bicycle routes and trails should be enhanced with improved signage and bicycle storage as well as the creation of dedicated bicycle lanes separated from the main roadway wherever possible. Additional public space for the bicycle sharing program and for visitor bicycle rentals should be reserved near federal workplaces, transit points, and major tourist destinations, including at the Metro stops on or near the National Mall.

The proposed citywide loading regulations are consistent with the following Comprehensive Plan for the National Capital: Federal Elements and Monumental Core Framework Plan policies:

Comprehensive Plan - *Preservation and Historic Features Element*

- Encourage the practice of good design principles throughout the region to continually strengthen the image of the nation's capital.

Comprehensive Plan – *Federal Workplace Element*

- Plan federal workplaces to be compatible with the character of the surrounding properties and community and, where feasible, to advance local planning objectives such as neighborhood revitalization.

Monumental Core Framework Plan

- Reinvent civic corridors and urban spaces to promote livability. Public spaces, particularly at the street level, should be programmed to support workers, visitors, and residents. The physical design of the street—from pedestrian-friendly, ground-floor space to the character of the sidewalks, medians, and rainwater collection systems—should be emphasized to reinforce walkability. Public spaces should be designed in a manner that relates to important cultural landmarks and maximizes connections to public transit.

The proposed citywide parking and loading zoning regulations directly address many of the issues expressed in the July 28, 2008 comment letter from NCPC to the Zoning Commission of District of Columbia as follows:

Car Sharing

The 2008 NCPC letter expresses support for zoning regulations that are more inclusive to car sharing, and the proposed citywide motor vehicle parking regulations accomplish this with a specific section for car share requirements (Section 1504 – *Car-Share Parking Space*)

Requirements). NCPC staff had one concern (expressed in the letter) about requiring car-share spaces in private buildings with federal tenants, due to a potential conflict between this regulation and federal security requirements. The City directly addresses this concern however, through the following “escape” clause requirement:

“1504.6 The owner of a building with tenants that are offices of the federal government or contractors with the federal government, and therefore have unusually high security needs, may be exempted from the requirements of §1504.5 at the discretion of the Zoning Administrator. An owner requesting exemption from §1504.5 shall provide the Zoning Administrator with an alternative accessibility plan that provides the maximum access to required car-share spaces consistent with the building’s security needs.”

“Unbundling” Parking and Housing Costs

The 2008 NCPC letter expresses support for the concept of “unbundling” parking and housing costs (minimizing housing-related parking costs). The proposed motor vehicle parking regulations help accomplish this through their greater flexibility in application, and the fact that they will limit parking in “Transit Oriented Development” zones. The current minimum parking requirements were originally implemented to protect curbside parking spaces and designed to accommodate average daily demand rather than maximum demand levels, resulting in excessive on-site parking and thereby increasing development-related parking costs.

Transportation Demand Management (TDM)

The 2008 NCPC letter states that all federal applicants are required to propose TDM strategies as part of a transportation management plan for all federal projects that will increase the employment level on a worksite to 500 or more, and supports this requirement as a model for consideration. Though the proposed regulations do not specifically mirror this requirement, they do allow for a potential reduction in required parking with the advent of a TDM plan.

Facility Design (Street Frontage, Porous Surfaces, Alley Access, Structured Parking)

The 2008 NCPC letter expresses support for parking to be located behind buildings (away from the public street side), allowable site access from improved alleys (in addition to public streets), allowance of pervious materials to be used in construction of parking lots/driveways, and structured parking rather than surface parking. The proposed citywide motor vehicle parking regulations are consistent with these comments with the provision of several different sections including: Section 1507 (“Access Requirements”), Section 1508 (“Size and Layout Requirements”), Section 1509 (“Maintenance Requirements”), Section 1510 (“Landscaping, Screening, and Lighting Requirements for Parking”). The proposed citywide loading regulations reflect these comments through the following sections: Section 1704 (“Location Restrictions”), Section 1705 (“Access Requirements”), Section 1706 (“Size and Layout Requirements”), and Section 1709 (“Screening and Lighting Requirements”).

Bicycle Parking

The 2008 NCPC letter expresses general support for the proposed bicycle parking regulations at that time, and the regulations have since been significantly refined since then, to better facilitate bicycling as a more convenient mode of travel for both work-related and non work-related trips.

Minimum and Maximum Parking Ratios

Specific maximum numerical parking requirements are still under development by the District as previously mentioned. However, the District Zoning Commission has agreed to the following significant limits as part of these proposed citywide motor vehicle parking regulations:

- There will be maximum limits on parking (for all newly constructed parking areas, or parking areas expanded by 25% or more), including no above-grade parking areas, in any zone, shall exceed 100,000 SF in land area;
- Maximum limits on the total number of parking spaces, and the number of parking spaces per square feet of gross floor area;
- Maximum limits on total parking spaces and on spaces per square foot differentiating (lower) between “Transit Oriented Development” (TOD) zones/Downtown, and zones without a TOD designation or in PDR (Industrial) zones.

Specific minimum numerical parking standards will be included in the specific Land Use Subtitles where they apply, which will be submitted to NCPC for review and comment in the future.

Therefore, staff recommends that the Commission:

- **Advises the Zoning Commission that the proposed language establishing new citywide motor vehicle parking, bicycle parking, and loading regulations as described in the rulemaking will not adversely affect the 2004 Comprehensive Plan for the National Capital: Federal Elements or any other federal interests.**
- **Commends the District on developing citywide parking and loading regulations that are consistent with federal policies contained in the 2004 Comprehensive Plan for the National Capital: Federal Elements and 2009 Monumental Core Framework Plan.**
- **Notes that there are several citywide zoning regulations contained in the “Maximum Parking Requirements” (Section 1503) section, which are still under review by the District, and that these regulations are scheduled for submission to the District of Columbia Zoning Commission in Spring 2011, after which time they will be reviewed by NCPC.**

ATTACHMENT A

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IN REPLY REFER TO:
NCPC File Nos. ZC 6817 & 6818

JUL 28 2008

Chairman Anthony Hood
Zoning Commission for the District of Columbia
441 4th Street, NW, Suite 210-South
Washington, DC 20001

Ref: Comments on the Proposed Amendments to the Parking and Loading Regulations, 11 DCMR

Dear Mr. Hood:

NCPC staff appreciates the opportunity to comment on the District of Columbia Office of Planning's proposed parking and loading chapters for the zoning regulations.

In general, NCPC staff supports DCOP's proposed changes in parking and loading regulations. As stated within the Federal Elements of the Comprehensive Plan, it is in the best interest of the federal government to encourage its employees to use transit and other alternative transportation options apart from the single-occupant commuter vehicle in order to reduce demand on the region's limited vehicular infrastructure. DCOP's proposals to employ alternatives to minimum parking requirements, add bicycle facility requirements, and update other important parking and loading regulations for the District of Columbia align with the Comprehensive Plan in principle. We look forward to our continued work with DCOP on these proposals.

The attached comments on the April 6th and July 15, 2008 drafts are provided by NCPC staff for your consideration. These comments reflect both general planning perspectives and identify specific federal interest issues. These comments have not been approved by official Commission action, and additional comments may be provided in the future, particularly as staff and our Commission have the opportunity to review draft updates.

If you have any questions, please feel free to call me at 202-482-7211.

Sincerely,

Julia Koster, AICP
Director, Planning Research and Policy Division

Enclosure

cc: District of Columbia Zoning Review Taskforce

Travis Parker, District of Columbia Office of Planning

NATIONAL CAPITAL PLANNING COMMISSION

Parking Minimums and Maximums

NCPC staff conceptually supports the proposal to employ maximum parking requirements and reduce the use of minimum parking requirements. NCPC staff understands that proposed quantities have not yet been established for zoning districts, and as such has limited its comments on this proposal to the following:

Minimum parking requirements—Parking minimums are proposed to be maintained for institutional uses, or non-residential uses, in predominately single-family areas. NCPC parking ratio policies in the Transportation Element under the Federal Elements of the Comprehensive Plan set maximum ratios for the number of parking spaces allotted per federal employee at federal installations and buildings. In areas within the District of Columbia but outside the Central Employment Area, parking ratios are set at 1 space per 4 federal employees. Because these are often federal institutional, research, or light industrial uses, NCPC staff finds that it may be useful to use this ratio as a benchmark when developing the proposed minimum parking requirement for institutional uses in predominately single-family areas. For planning purposes, GSA policy allocates 230 rentable square feet (rsf) of office space per federal employee. Using that figure to convert the 1:4 parking ratio maximum to parking spaces per square foot of space would result in 1 space for each 920 rsf (a slightly more restrictive requirement than the 1 space for each 1000 square feet identified in table P.2.1).

NCPC staff also note citizen interest and concern regarding parking impacts on residential neighborhoods from new developments, and encourages the District to ensure that residential parking enforcement programs are coordinated in concert with these proposed parking standards.

Maximum parking requirements—NCPC staff note that within the Central Employment Area (where C-3 and above is likely to be located), parking ratios within the Transportation Element under the Federal Elements of the Comprehensive Plan are set at 1 space per 5 federal employees. Where applicable as a model, or benchmark, for DC to use in its regulation of land use on private property, NCPC staff recommends employing a similar ratio. We see mixed use and commercial districts as having some characteristics similar to the CEA. That is, both districts have a high intensity of office space and are a destination for employees who commute to work. Therefore, it may be useful to compare the proposed minimum parking requirement to the maximum parking ratio for the CEA of 1 space per 5 federal employees. Using GSA's 230 rsf of office space per federal employee to convert the 1:5 parking ratio maximum to parking spaces per square foot of space would result in 1 space for each 1,150 rsf.

In addition, DCOP has not yet defined transit oriented zones in this draft of its proposed parking regulations. NCPC notes that this definition is central to the process of identifying parking maximums and recommends that it be defined both quantitatively and qualitatively.

Other Parking Issues

NCPC staff encourages the continued consideration of innovative approaches to incentivize the use of alternative forms of transportation over the single-occupant vehicle and offers the following comments on the proposed regulations:

Contributions to a DDOT transportation fund—NCPC staff generally supports contributions to a transportation fund in lieu of providing fewer parking spaces than the minimum required or providing more spaces than the maximum allowed. NCPC staff would encourage a nexus between why these funds have been collected and how they are to be used (i.e., will these funds be used for specific capital or operational proposals such as a building of a shared garage or the management of a carpool permit parking program).

Shared parking—NCPC staff agrees with the concept of shared parking as a strategy to influence the supply of off-street parking and support parking maximums and recommends that it not just be allowed, but encouraged through use of developer incentives. Shared parking, however, should not be required as it may not be feasible in buildings with federal tenants that have requirements for secured space.

Car sharing—NCPC staff supports the inclusion of car sharing within the proposed regulations, as car sharing may be a viable transportation option for federal employees both on and off duty. However, how this proposed regulation can be implemented in buildings with federal tenants needing secured space should be further considered.

Parking for carpools—The Transportation Element within the Federal Elements of the Comprehensive Plan promotes providing priority parking to carpools and vanpools as an extra incentive for employees to leave their cars at home. NCPC staff recommends that a similar incentive is considered within the proposed regulations (while accommodating the physically disabled in accordance with federal law).

Unbundling of parking costs—NCPC staff supports the concept of charges for parking access from the lease or sale of development space to make the cost of vehicle ownership and use transparent to tenants as identified in DCOP's consultant report, and understands that this concept is under consideration for implementation by DCOP via other programs. This single measure may be the most effective means for encouraging developers to "right-size" their accessory parking plans once minimum requirements have been eliminated or reduced.

Transportation Demand Management (TDM)—The concept of TDM does not appear to be in the proposed language. However, under P.3.7 (f), the proposed language does require that if the applicant relies on a TDM program, the applicant shall demonstrate that the program continue as long as the use continues. It is unclear if, in fact, TDM strategies are to be included in the proposed regulations, which NCPC staff supports. NCPC requires all federal applicants to propose TDM strategies as part of a transportation management plan for all federal projects that will increase the employment level on a worksite to 500 or more and supports this requirement as a model for consideration.

Facility Design

Street frontage—NCPC staff strongly supports liner buildings fronting off-street parking facilities to activate streets with ground-floor retail uses and pedestrian sidewalk traffic. In particular, NCPC staff supports this type of design where vistas and views and functional qualities of the rights-of-way that are an integral part of the national capital's image are protected

and enhanced as promoted within the Preservation and Historic Features Element under the Federal Elements of the Comprehensive Plan.

Porous surfaces—NCPC staff commends the introductions of porous or pervious surfaces and mechanically-reinforced grass as allowable, and recommends adding a proactive incentive for developers who use these more sustainable and low-impact materials. NCPC recommends studying ways to promote these surfaces in public alleys, where appropriate.

Alley access—NCPC staff supports requirements to access parking areas through improved alleys. However, a comprehensive review of how this proposal may conflict with current District practices and policies related to alley closures may be warranted.

Structured parking—The Transportation Element under the Federal Elements of the Comprehensive Plan promotes the placement of parking in structures, preferably below ground, in the interest of efficient land use and good urban design. NCPC staff recommends that a proactive incentive for developers to do so be considered.

Bicycle Parking

NCPC staff strongly supports the bicycle parking requirements within the proposed language and notes that they are generally consistent with bicycle facility policies within the Transportation Element under the Federal Elements of the Comprehensive Plan.

Loading

NCPC staff supports the proposed language that limits locations for loading berths, platforms and service delivery spaces to within the building or structure the berths of spaces are designed to serve; or to the rear of the principal building or otherwise screened so as to not be visible from public right-of-way. In particular, NCPC staff supports this type of design where vistas and views and functional qualities of the rights-of-way that are an integral part of the national capital's image are protected and enhanced as promoted within the Preservation and Historic Features Element under the Federal Elements of the Comprehensive Plan. NCPC staff recommends that DCOP considers opportunities for developments to share these facilities.