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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 4<sup>th</sup> 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

### **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.