

27 July 2008

Chairman Anthony Hood  
Vice-Chair Gregory Jeffries  
Commissioner Curtis Etherly, Jr. Esq.  
Commissioner Michael Turnbull, FAIA (Office of the Architect of the Capitol)  
Commissioner Peter May (National Park Service)

Zoning Commission, DC Office of Zoning  
441 4<sup>th</sup> Street NW  
Suite 210 South  
Washington, DC 20001

Re: AIA|DC Comments on Parking Recommendations prepared by DC Office of Planning

This letter provides comment on the Parking Recommendations prepared by DC Office of Planning (OP). These comments are made on behalf of the 1800 members and the Board of Directors of the Washington, DC Chapter of the American Institute of Architects (AIA|DC). The Chapter is pleased to be part of the Task Force and commends OP's process for its inclusiveness.

In general, we agree with many of the recommendations, such as eliminating parking minimums (in non-spillover areas) and implementing targeted maximums. This is a commendable policy shift in keeping with current smart growth theory and research. However, we have concerns regarding several recommendations which we believe need additional review by OP and the Commission:

1. Recommendations #1 and #2 appear to align with AIA|DC's support of smart growth and sustainable design. However, we are concerned that if the maximums are set too low that this may result in a dampening effect on the DC market for a variety of building types. We encourage further discussion by the Working groups on maximum limits.
2. Recommendation #4 sets a relatively high contribution to the transportation fund. We would like clarification on how the cost of a parking space will be determined by DDOT for different types of construction (surface, structured, below grade, etc.). We are also concerned about how the transportation fund revenue will be managed and spent. We believe that these funds should be strictly limited to transportation improvements local to the project.
3. Recommendation #7 sounds good in concept, particularly as an urban design strategy in enhancing the pedestrian streetscape. However, there are important functional considerations related to vehicular circulation, parking, and loading. Thus, we are concerned about the potential impact of this recommendation as it relates to alley congestion. Many alleys are too narrow for two-way traffic. We believe this recommendation may result in a conflict between loading functions and proposed increased parking garage ingress and egress requirements, particularly in cases where several buildings would be sharing the same alley or set of alleys. Loading access should be given precedence over parking access. We recommend that OP study the existing alley system in key areas such as the downtown area and complete the necessary traffic analysis regarding AM and PM peak vehicular trips that will now be concentrated in fewer locations. We are also concerned about the potential conflicts with

pedestrian circulation when vehicular access is concentrated rather than dispersed with a potential increase in vehicles queuing in the street waiting for a gap in pedestrian circulation.

4. Recommendation #8 appears to align with good urban design principles, particularly in more dense commercial and residential areas with alley access. However, this strategy may not be preferred in low density zones without alleys. In these areas, side-yard parking may actually be preferred in order to reduce the amount of asphalt paving and impervious surface area associated with long driveways extending all the way to rear-yard parking.
5. Recommendation #10 includes a number of helpful screening requirements. However, the requirement that parking be screened with a solid brick or stone wall seems to be overly prescriptive. We believe that there are many ways of accomplishing the desired aesthetic goal without being so specific about a particular material choice.

Thank you for the opportunity to comment on these proposals. We look forward to working further with OP through our Task Force and Working Group involvement to refine the proposed revisions to the zoning regulations in the best interests of the community.

Sincerely,

Barbara Laurie, AIA  
President