



COALITION FOR SMARTER GROWTH

December 10, 2009

Mr. Anthony Hood
Chairman, D.C. Zoning Commission
District of Columbia Office of Zoning
441 4th Street, NW, Suite 210 South
Washington, DC 20001
Via Fax: 202-727-6072

RE: Case Number 09-03: (Skyland) Support with reduced parking

We support the redevelopment proposal for the Skyland Shopping Center. We welcome this mixed use development that provides a modest amount of below market rate housing. Our chief concern is that the project is excessively over-parked – wasting resources on too much parking that could be used for more productive uses.

We urge the Zoning Commission to reduce the excessive amount of parking proposed for the project. We concur with the recommendations of the Department of Transportation and the Office of Planning that this project is providing substantially more parking than is appropriate for the site.

We are concerned that the 1,698 parking spaces proposed for the project are based on suburban single use land use assumptions that do not account for transit access. The census tract that this project is located in has a high amount of transit use, with 28 percent of workers riding the bus, Metro or walking to work. One third of households in the census tract do not own a car, another 40 percent own only one car. Among renters, nearly half do not own a car (46 percent), and among owners, nearly half own no or only one car. The high transit ridership and low car ownership rates of this area are not typical characteristics assumed by conventional traffic models. Thus the proposed parking ratios for the housing and retail users are inappropriate for the site.

Dedicating too much land and money to vehicle parking is harmful and carries a number of opportunity costs. Too much parking is harmful to the city and neighborhood because it encourages unnecessary traffic when alternatives to driving could be encouraged and reduce the amount of traffic generated by the site. Space and money dedicated to parking could be reallocated to more productive uses such as more pedestrian-friendly features, Transportation Demand Management (TDM) benefits such as discounted transit passes for workers and residents, a transit trip pass equivalent to parking validation, attractive bicycle parking, enhanced bus facilities, taxi vouchers, free goods delivery, and on-site Zipcars. If the project were redesigned to take advantage of less space consumed and cost by parking, additional or more affordable housing or retail space, or civic/recreational space could be provided.

Affordable Housing – while we applaud medium density housing and commercial space at this location, we are concerned that the income targeting for the 30 percent of this mixed income project on government-owned land is too high. First, 80-120 percent AMI should not be included as an affordable housing benefit. This is substantially above D.C.'s median family income. Secondly, historically, the city has used NCRC properties and city land to provide affordable housing opportunities to those earning well below D.C.'s median family income – at 60 and 30 percent of area median income. We ask that the housing affordability be targeted to lower income levels to truly benefit low income working families.

Overall, we are enthusiastic about this project and believe it will be a great contribution to the city and the neighborhood. With our suggested changes, this project can be even better.

Thank you for the opportunity to comment.

Sincerely,

Cheryl Cort
Policy Director