



Coalition for Smarter Growth

DC • MD • VA

January 27, 2015

DC Board of Zoning Adjustment
441 4th Street NW Suite 200S
Washington, DC 20001, via: bzsubmissions@dc.gov

Re: Support for BZA Case Number 18866 – 1108 16th Street, NW

Dear Chairperson Jordan and members of the Board:

Please accept these comments on behalf of the Coalition for Smarter Growth. The Coalition for Smarter Growth is the leading organization in the Washington, D.C. region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

We wish to express our support for the proposed reduced parking to a total of 4 spaces to serve the redevelopment project at 1108 16th Street, NW which will provide office space and 15 residences, while preserving the historic façade of the original building. Given the awkward site and preserved historic features, the reduced parking is reasonable relief, especially for such an accessible location.

We urge the Board to weigh the soon to be replaced zoning code parking requirement against the actual need for on-site parking. Offering more commercial and residential space at this location will give occupants the opportunity to use the robust nearby transportation options which include major bus, Metrorail, and someday streetcar services, along with walk and bicycle access to every kind of destination for both workers and residents. In addition, providing the code-required parking for the site would be extreme – more than half a million dollars per space or roughly 10 times the typical cost of a parking space.

We note that the draft zoning regulations will require no parking for this Downtown zone. We agree with the draft parking regulations for downtown sites like this one – no parking should be required because there is no fixed amount of parking needed and developers are in a better position to determine the supply needed based on marketability and cost considerations.

There is no public harm from a reduced number of parking spaces since long term public street parking is not an option for users of the building, and other modes of access are plentiful. By contrast, unnecessary vehicular traffic and pollution generated by additional parking will negatively affect current residents and drivers.

This site's Census Tract already has a low car ownership rate – 65.6% of households are car-free – which correlates with the high accessibility of the area.¹ According to Walkscore.com (Walk Score is a number between 0 and 100 that measures the walkability, transit accessibility, and bikability of any address), we find that the site has a Walk Score of 99 (deemed a “walker's paradise”), a transit score of 94 (“rider's paradise”), and a bike score of 84 (“very bikeable”) (see attachment).

The Transportation Demand Management (TDM) program provided by the applicant builds on these accessibility advantages. If some of the occupants of the building do want store a personal car, they will have their choice of many nearby commercial garages which have excess space available. However, occasional use of a car has never been easier with the availability of many nearby car sharing vehicles like Zipcar, Enterprise, and Hertz, along with Car2Go (a point to point car sharing service). In today's city, using a vehicle for shorter trips is even less reliant on owning a personal vehicle as smartphone app-enabled for-hire car and taxi services (like Uber and Lyft) have made these services far more convenient than in the pre-smartphone era.ⁱⁱ

Our city continues to grow rapidly. We caution against further reducing the commercial space and housing opportunities at this “walkers & riders’ paradise” location. A growing number of people and businesses would like the opportunity to live and work in such a convenient place. Rather than shrinking the working and living space at this location to fit an outdated requirement that seeks to guess what constitutes the right amount of vehicle parking needed, we ask that the BZA consider the walk, transit, and bicycle access advantages of this location, along with the nearby excess parking capacity.

In a short time, the parking requirements that are the subject of this relief request will be rightfully revised to zero. In the meantime, this reasonable and beneficial project requires the thoughtful review of the BZA. The proposal offers extra efforts to ensure that any parking demand generated by this redevelopment can be easily accommodated, while enhancing the robust non-parking modes of access to the site. We concur with the Office of Planning, the Department of Transportation, and ANC 2B: this is an appropriate proposal with many benefits to the public.

We urge the BZA to support this reasonable request to provide access to the site in ways that best take advantage of the location and support the public interest.

Thank you for your consideration.

Sincerely,

Cheryl Cort
Policy Director

Attachment:
Walk Score results
Walk Score ratings
Screenshot of Car2Go in area on weekday

Walk Score Find Apartments Get Scores My Favorites

Type an address, neighborhood or city **Go**

1108 16th St NW
Downtown, Washington D.C., 20036

Commute to **Downtown Washington D.C.**
 1 min 2 min 1 min 3 min View Routes

Favorite **Map** **Nearby Apartments**

Looking for a home for sale in Washington D.C.?

Walk Score 99 **Walker's Paradise**
Daily errands do not require a car.

Transit Score 94 **Rider's Paradise**
World-class public transportation.

Bike Score 84 **Very Bikeable**
Flat as a pancake, excellent bike lanes.

[Score Details](#)

94 Rider's Paradise
1108 16th St NW is a Rider's Paradise which means world-class public transportation. Car sharing is available from Zipcar, Hertz On Demand and RelayRides.

Rail lines:

Red Metrorail Red Line	0.2 mi	Orange Metrorail Orange LL	0.3 mi
Blue Metrorail Blue Line	0.3 mi	Silver Metrorail Silver Line	0.3 mi
Green Metrorail Green Line	0.8 mi	Yellow Metrorail Yellow Line	0.8 mi

Bus lines:

325 COLUMBIA & SILVER SP...	0.0 mi	315 COLUMBIA & SILVER SP...	0.0 mi
S1	0.0 mi	52	0.0 mi
S4	0.0 mi	59	0.0 mi
DCWE DC Circulator: Geog...	0.2 mi	260 SEVERNA PARK & DAVL...	0.2 mi
640 WALDORF & ACCOKEEK...	0.2 mi	650 LA PLATA, WALDORF & ...	0.2 mi

Car shares:

Zipcar: 1150 15th St NW at...	0.1 mi	Zipcar: Scott Circle East - CL	0.1 mi
Zipcar: Scott Circle West - CL	0.1 mi	RelayRides: 2007 Honda Civic	0.1 mi
Zipcar: 1100 15th Street NW	0.2 mi	Zipcar: 1725 Desales St NW...	0.2 mi
Hertz On Demand: 17th St E...	0.2 mi	Zipcar: 17th St NW	0.2 mi
Zipcar: 15th St NW	0.2 mi	Zipcar: Andover House	0.2 mi

Bike shares:

Capital Bikeshare: 17th & R...	0.1 mi	Capital Bikeshare: 17th & K...	0.2 mi
Capital Bikeshare: Thomas...	0.2 mi	Capital Bikeshare: 17th & K...	0.3 mi
Capital Bikeshare: 18th & M...	0.3 mi	Capital Bikeshare: 15th & P...	0.3 mi
Capital Bikeshare: 14th & R...	0.3 mi	Capital Bikeshare: 15th & P...	0.3 mi
Capital Bikeshare: 19th & L...	0.4 mi	Capital Bikeshare: 19th & K...	0.4 mi

[Less](#)

Walk ratings

Walk Score	Transit Score	Bike Score
90-100	Walker's Paradise Daily errands do not require a car	
70-89	Very Walkable Most errands can be accomplished on foot	
50-69	Somewhat Walkable Some errands can be accomplished on foot	
25-49	Car-Dependent Most errands require a car	
0-24	Car-Dependent Almost all errands require a car	

Car2Go screenshot of area on weekday

https://www.car2go.com/en/washingtondc/

Business customers car2go Apps Social Medi

Map showing Car2Go locations in downtown Washington D.C. (Area around 16th St NW, 17th St NW, 18th St NW, 19th St NW, 20th St NW, K St NW, L St NW, M St NW, N St NW, P St NW, R St NW, S St NW, T St NW, U St NW, V St NW, W St NW, X St NW, Y St NW, Z St NW, AA St NW, AB St NW, AC St NW, AD St NW, AE St NW, AF St NW, AG St NW, AH St NW, AI St NW, AJ St NW, AK St NW, AL St NW, AM St NW, AN St NW, AO St NW, AP St NW, AQ St NW, AR St NW, AS St NW, AT St NW, AU St NW, AV St NW, AW St NW, AX St NW, AY St NW, AZ St NW, BA St NW, BB St NW, BC St NW, BD St NW, BE St NW, BF St NW, BG St NW, BH St NW, BI St NW, BJ St NW, BK St NW, BL St NW, BM St NW, BN St NW, BO St NW, BP St NW, BQ St NW, BR St NW, BS St NW, BT St NW, BU St NW, BV St NW, BW St NW, BX St NW, BY St NW, BZ St NW, CA St NW, CB St NW, CC St NW, CD St NW, CE St NW, CF St NW, CG St NW, CH St NW, CI St NW, CJ St NW, CK St NW, CL St NW, CM St NW, CN St NW, CO St NW, CP St NW, CQ St NW, CR St NW, CS St NW, CT St NW, CU St NW, CV St NW, CW St NW, CX St NW, CY St NW, CZ St NW, DA St NW, DB St NW, 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ⁱ US Census 2009-2013 ACS 5 Year Estimates, DP04, Vehicles Available for Census Tract 107, District of Columbia.

ⁱⁱ For more on the scope of this change, see: [A New Way to Go: The Transportation Apps and Vehicle-Sharing Tools that Are Giving More Americans the Freedom to Drive Less](#), by US PIRG.