



Government of the District of Columbia
**Advisory Neighborhood
Commission 6C**

May 11, 2017

The Hon. Mary M. Cheh
Chair, Committee on Transportation and the Environment
Council of the District of Columbia
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Re: B22-0125 (Small Business Parking Permit Act of 2017)

Dear Councilmember Cheh:

On March 8, 2017, at a duly noticed regularly scheduled monthly meeting, with a quorum of six out of six commissioners and the public present, ANC 6C considered the legislation noted above. After deliberating, the commissioners voted 6-0 to oppose the bill for the reasons set forth below and to authorize Commissioner Mark Eckenwiler (6C04) to present our views in person at any upcoming hearing on the Act.

The Small Business Parking Permit Act would allow any “small business” that abuts a duly designated residential-permit-parking block to obtain up to ten permits for use in that RPP zone. The Act defines “small business” as any District-based business, other than a home business, having no more than one location or ten employees and “no parking which it controls.” The Act also provides expressly that the fee for such permits shall not exceed the standard RPP fee.

ANC 6C strongly opposes this measure because

- residential areas near commercial corridors already bear the burden, often significant, of parking pressure from customers, deliverypersons, and others visiting those businesses.
- the fundamental purpose of the RPP program, as evidenced by its name, is to protect the interests of **residential** users.
- District government policy should encourage business employees and customers to use public transit or other transportation modes, not provide low-cost parking in nearby residential zones.

Moreover, permits issued under the proposed program would not be limited to the immediate vicinity of the small business, but would instead needlessly grant parking privileges across an entire RPP zone/ward. Section 4(a) grants an owner of a small business the same privileges as an onsite worker regardless of whether the owner has any role in day-to-day operations requiring physical presence at the business. And as structured, the bill would actively encourage small

businesses to divest themselves of parking under their legal control and instead obtain far cheaper parking privileges in the nearby RPP zone.

We note that it would be easy for unscrupulous owners to game the proposed system by creating multiple LLCs or other corporate entities, each eligible for up to ten permits. It is unclear how DDOT or other District agencies would be able to easily fact-check an applicant's inflated claim of the number of its employees. It is also unclear what it means under the Act for a small business to "abut" an RPP block.

Thank you for giving great weight to the views of ANC 6C.

Sincerely,



Karen Wirt
Chair, ANC 6C

cc: The Hon. Charles Allen
The Hon. Brianne K. Nadeau
The Hon. Brandon T. Todd
The Hon. Robert C. White, Jr.