

	<p align="center">ADVISORY NEIGHBORHOOD COMMISSION 3C GOVERNMENT OF THE DISTRICT OF COLUMBIA <i>CATHEDRAL HEIGHTS • CLEVELAND PARK • MASSACHUSETTS AVE. HEIGHTS MCLEAN GARDENS • WOODLEY PARK</i></p>
<p>Single Member District Commissioners 01-Lee Brian Reba; 02- Gloria Day; 03-Stephanie Zobay 04-vacant; 05-Bruce Beckner; 06-Trudy Reeves 07- Richard Rothblum; 08-Catherine May; 09-Nancy MacWood</p>	<p align="right">4025 Brandywine Street, NW Washington, DC 20016-1843 P: (202) 657-5725 F: (515) 474-8595 Website http://www.anc3c.org</p>

ANC3C RESOLUTION NO. 2008-021
Regarding Commenting on the Proposed
Valet Parking Regulations

WHEREAS the District Department of Transportation (DDOT) has given notice of the intent to add a new Chapter 16, entitled “Valet Parking,” to Title 24 of the Public Space and Safety Regulations that would govern parking services that utilize the District of Columbia’s public space; and

WHEREAS Advisory Neighborhood Commission 3C (ANC 3C) has valet parking operations at some of its restaurants and residents have complained that vehicles are parked on residential streets which deprives residents of needed parking spaces:

THEREFORE BE IT RESOLVED that ANC 3C endorses the intent of the proposed regulations to prohibit valet parkers from parking on public streets and alleys and has the following specific comments:

Section 1600.1 There should be a description of public space that includes all sidewalks, streets, and rights of way. Also, the section should indicate if hotel parking services are intended to be regulated by this chapter.

Section 1600.3 The term Permittee should be followed by “as defined in Section 1699.1” so that there is no confusion about who the permittee may be.

Section 1601.2(g) The photographic submission accompanying the application should also include a diagram with dimensions of the proposed staging area and the number and location of any public parking spaces to be removed. Without this information, it will be very difficult for an ANC to determine the impact of the staging area.

Section 1601.2(j) Off-street parking facility should be plural throughout the regulations since it is contemplated that more than one parking facility may be necessary to park the volume of cars utilizing the service.

Section 1601.2(k) The full occupancy rate of the business(es) served by the valet parking operation should be based not only on the Certificate of Occupancy, but also on any Public Space permits issued for an enclosed or unenclosed sidewalk café and any Alcoholic Beverage Regulatory Administration entertainment endorsements.

Section 1601.2(l) This section requiring Notice to the affected ANC should include notice to more than one ANC if the staging area and parking facility(ies) cross ANC boundaries.

Section 1601.2(m) Notice to adjacent property owners should include property owners near the staging area as well as the off-street parking facility(ies).

Section 1601.3 How will the Valet Parking application and Plan be made available to the public for viewing? This requirement should be clarified. Also, the requirement that the notice be posted in a conspicuous site near the proposed staging area should be clarified to include posting only on private property and not in public space.

Section 1602.2(a-c) Reference to valet parking operation or operator should be plural since an application could include more than one establishment with different valet parking operations utilizing the same staging area. If this is not an arrangement contemplated by DDOT, the regulations should clarify the requirements pursuant to a joint application.

Section 1602.2(e) A section should be added to the list of findings that determine whether an application may be approved by the Public Space Committee which states that the affected ANC(s) have not opposed the application or the issuance of a valet parking permit. This is a very important addition since without it there is no provision to give ANC recommendations great weight.

Section 1602.3(e) This section should indicate if more than one Valet Parking Operator could be approved for a single staging area. If that is the case the estimated number of motor vehicles that will be parked should cover all the operators using a single staging area.

Section 1602.4 DDOT may want to issue a conditional permit that could be modified later in compliance with proposed Section 1603.1 which states that Permittees may be required to share a valet staging zone.

Section 1603.2 The permit should also include the location of the valet parking facility(ies). It will be difficult to enforce the parking aspect of the permit if the permit doesn't list the location where vehicles are to be parked.

Section 1603.4 Double-parking should be prohibited at the valet staging zone or anywhere on a street or right of way in the vicinity of the valet parking operation.

Section 1603.5 The valet staging zone should not be used to impede pedestrian movement or normal traffic movements.

Section 1603.9 A new section should be added which states that the valet staging zone should be returned to its original public space use after the permitted hours of valet parking operation.

Section 1605.2 The public space rental fee should cover a specific time period, for example, one year. The proposed fee of \$15/square foot seems arbitrary. It does not consider how long the public space will be used and it doesn't seem to relate to revenues earned through the use of public space. Requiring the Permittee to assume all the direct costs in creating the valet staging zone is appropriate, but requiring reimbursement to DDOT for lost revenue presumably from parking meters located in the staging zone is double-dipping. The fee should reflect a reasonable formula that includes the number of linear feet in public space

used, the amount of time per week it will be used, and the intensity of the use being replaced by the valet staging area.

Section 1605.3 The Permittee is not parking the vehicles, so this section should state that “any person engaged in parking or driving motor vehicles for a Valet Parking Operator and Permittee shall not park...” Also, there should be clear responsibility for paying any parking or moving violations resulting from the Valet Parking Operation.

Sections 1605.4 and 1605.5 Affected ANC(s) should also receive notice in writing of any material changes in the approved Valet Parking Plan.

Section 1699.1 Definition of Permittee should be expanded so that it is clear that this person has been issued a Certificate of Occupancy for the establishment that will use the valet parking service.

BE IT FURTHER RESOLVED that the Chair, or her designee, is authorized to represent the Commission on this matter.

Attested by



Nancy J. MacWood

Chair, on March 18, 2008

This resolution was approved by a vote of 6-0 on March 17, 2008 at a scheduled and noticed public meeting of ANC 3C at which a quorum (a minimum of 5 of 9 commissioners) was present.