

NEIGHBORS FOR A LIVABLE COMMUNITY

3700 University Avenue NW
Washington, DC 20016

July 19, 2018

The Honorable Anthony Hood, Chair
D.C. Zoning Commission
441 4th Street NW, Suite 200S
Washington, D.C. 20001

**RE: Z.C. Case No. 18-06 – Office of Planning Text Amendment To Subtitle G Creating A
New MU-4A Zone And Remaining MU-4 To MU-4B**

Dear Chairman Hood and Commissioners:

On behalf of Neighbors for a Livable Community (NLC), I am writing to indicate our support in the above referenced case for the text amendment proposed by the D.C. Office of Planning (OP) that would establish an MU-4A zone and rename the current MU-4 zone designation as MU-4B. NLC supports the position taken by the Committee of 100 on the Federal City in this case and wants to associate itself with the views expressed in this case by the Committee of 100.

NLC, a D.C. non-profit corporation, was established in 1987 by concerned neighbors of American University (AU) to protect the quiet, long-established neighborhoods surrounding AU, including Spring Valley, Wesley Heights, and American University Park. This mission of the corporation, as outlined in its Articles of Incorporation, includes the following:

“To promote the planning and use of commercial property adjoining residential property in Ward 3 of the District of Columbia, and in particular, the neighborhoods of Spring Valley, Wesley Heights, and American University Park so as to ensure that those uses do not adversely affect the stability and serenity of the neighboring residences and residential communities.”

The NLC’s purpose is to provide a broad perspective relating to community concerns regarding objectionable impacts that may result from development and growth in the neighborhoods within the vicinity of universities, non-profit institutions, and commercial properties.

In offering this text amendment, OP acknowledges that the MU-4A zone may apply in other neighborhoods in the city beyond the residential neighborhood adjacent to 3200 Pennsylvania Avenue SE that, in Z.C. Case No 17-11, served as the genesis for this text amendment. The proposed text amendment has potential impacts for several commercial areas within Spring Valley, Wesley Heights,

and American University Park that border low density residential neighborhoods. So, we embrace the recommendation made by the Committee of 100 that the new MU-4A zone be applied citywide in areas where low to moderate density mixed use zones abut low density residential zones. This will provide a greater degree of protection for existing low density residential zones that is not now provided in ZR-16 and help ensure that new development in these zones is not out-of-scale with the adjacent residential neighborhoods. NLC believes OP should be instructed to map the new zone automatically in MU-4 zones where low density residential zones and commercial zones share a zone boundary.

NLC believes the zoning reclassification will provide opportunities for lively commercial areas consistent with the character of low density residential neighborhoods and that complement the interests of residents who choose to live in such low density residential neighborhoods. We also believe that the new MU4-A zone will ensure that commercial areas are not overbuilt in such a way as to permanently alter the low density characteristics that prompted residents to choose to live in these low density neighborhoods.

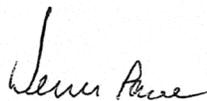
NLC wants to emphasize the C100's recommendation that the Zoning Commission codify the definition of the term "abut," as it is applied in zoning cases. Low density residential neighborhoods that share a boundary with a commercial zone should be considered to "abut" the commercial zone even if the two zones are separated by an alley or a street. It is silly to think that low density residential neighborhoods are not impacted by a commercial zone simply because its border includes an alley or a narrow street. NLC believes the new MU4-A zone should apply where a low density residential neighborhood and a commercial zone are separated only by a street or alley. An alley or a street should not be viewed as a high wall that protects residents from the impacts of commercial development.

NLC also endorses the C100 recommendation that the maximum permitted Floor Area Ratio (FAR) for the MU-4A zone be 1.5 or 2.0 with inclusionary zoning (IZ).

NLC applauds OP and the Zoning Commission for keeping its commitment to consider revisions in the 2016 zoning regulations as application of the new regulations demonstrate impacts that may have not have been anticipated when the ZR regulations were drafted and approved. Z.C. Case No. 17-11 has demonstrated the need for a new MU4-A zone. ZR-16 anticipated this need and provides for a public hearing process that enables residents across the city to engage fully in this process through Z.C. Case No. 18-06.

Thank you for this opportunity to present these views.

Sincerely,



Dennis Paul
President