

Proposed Amendments to Zoning Regulations Governing Downtown
ZC 08-06-10
November 30, 2009

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 2010 NOV 30 PM 2:00

The Committee of 100 on the Federal City

The Committee of 100 on the Federal City has long supported a mix of development downtown, pressing for in-town residential investment to create a lively, mixed range of uses. Long before adding residences to downtown office uses became popular, C100 advocated for a wider range of uses as the hallmark of a successful central city.

Not surprising, then, is our general support for the goals outlined in proposals prepared by the Office of Planning. Not surprising, either, are a range of concerns we ask the Commission to weigh carefully when considering guidance to OP.

As the proposed new standards are applied "on the downtown perimeter," great care must be taken to avoid overwhelming – tipping – the abutting residential neighborhoods. Perhaps the most immediate example of such a harmful impact would be Foggy Bottom/West End, where downtown-level development has all but eradicated a residential community of great character. Similarly, historic districts and landmark properties must be specially accommodated when setting development standards.

Simplifying the process for establishing such development standards downtown is certainly justified, as OP recommends, but again caution should be used lest expansion go too far, become too dense. The OP citation of a Brookings report containing a goal of adding 100,000 new residents conflicts with very specific action by the Council when considering the current Comprehensive Plan. Council eschewed this numerical goal, which Alice Rivlin acknowledges was pulled out of thin air during Control Board discussions. It is not policy guidance.

And last, the Commission must clarify what is intended to be covered by "arts" provisions. At the time OP presented its recommendations for arts zones, we spoke specifically about what we think are ill-considered and overly broad provisions included at that time. We asked:

Why is a Bookstore an arts use? What size and complexity of activities would fit under an Arts Organization and how big could it be? Why is Architecture an art, but medicine – the healing art – not? Are tattoo parlors Graphic design studios? Why are Bars, Nightclubs, Cocktail Lounges, Fast-food Establishments, and Prepared Food Shops considered Entertainment Arts? Are they culinary arts – at a bar? What limits will govern the Multi-function Use Group's Art Center?

We cited the OP report's own acknowledgment that the Downtown District had swung too far toward a purely entertainment district. How uses will be chosen for emphasis and by whom are questions that remain to be answered for future Arts Zones or Overlays, particularly in downtown.

The specific language that will flesh out the general principles for simplifying DD principles outlined in the current OP report will carry great significance, and we look forward to working on

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that language. We believe that the device of Housing Credits may be a very promising development. We would, in the interim, offer the following observations:

Height. There may be a need for more fine-grained distinctions in permitted heights. The case of the "small" rooftop addition at the Hay-Adams hotel is instructive; it could only be permitted by granting the equivalent of several additional stories since no intermediate standard was available.

Height determinations based on street width should be amended so that when streets are narrowed through the introduction of medians or other dividers, the permitted height of future buildings would also be reduced.

Parking. C100 does not object to "unbundling" parking spaces from residential units, but we tend to be far more trusting of market forces than the Office of Planning. Developers willing to put their capital at risk based on an informed plan of development should generally be permitted to do so.

We are somewhat troubled by OP's rigidity on options for parking in support of retail (and professional) operations, especially in light of the underperforming retail sector downtown. Continuing to make it easier to drive to, say, Pentagon City than to access downtown commercial parking adds to the burden of downtown retailers. Similarly, professional office space should not be left totally dependent on private taxicab service, as was suggested during working discussions when greater convenience is available to clients and patients in other areas.

Billboards. This would appear to be a ripe opportunity for clarifying rules on the siting or moving of large billboards, prohibited in the District until fairly recently. They have a deadening and disconnecting effect on streetscapes and the pedestrian environment. Existing signs should be allowed to wither away, and no additional signs should be permitted.

Barbara Zartman, Chair
Zoning Subcommittee