



**ZONING COMMISSION FOR THE DISTRICT OF COLUMBIA
PUBLIC HEARING FOR THE PURPOSE OF CONSIDERING**

**CASE NO. 08-06 (Comprehensive Zoning Regulations Review:
Chapter B-13: Green Area Ratio)**

December 20, 2010

Testimony of Alma Hardy Gates

Good evening members of the Commission, I am Alma Gates testifying on behalf of the Committee of 100 on the Federal City, formed in 1923 to act as a force of conscience in the evolution of the Nation's Capital City. It is in that spirit that the Committee has participated in the Zoning Regulations Review and is before you tonight in support of Green Area Ratio (GAR). The Committee participated in the Task Force sessions on Sustainability, GAR and also contributed to the development of the Department of the Environment's pending Stormwater Regulations.

GAR is timely and necessary to help minimize impacts resulting from increased lot coverage and the potential for excessive stormwater runoff, a deterioration of air quality and a more intense urban heat island. The outcomes of greater lot coverage have grown exponentially over time as areas of the city have expanded and developed; and, will continue to effect the urban environment unless and until regulations are put in place that help prevent environmental deterioration. Additionally, the purposes outlined in § 1500.4 further define the how, what and when GAR will be applied.

The relationship between the sections on land use and applicability (§§ 1501 and 1502) limit GAR to buildings requiring a Certificate of Occupancy (COO). While a COO is the control lever for signoff approval, GAR regulations apply to all zones in all land use subtitles. If this chapter is to be comprehensive and effective, green site design must apply to all new buildings, as well as significant additions,

ZONING COMMISSION

District of Columbia

District of Columbia

CASE NO. 08-06

EXHIBIT NO. 110

CASE NO. 08-06

EXHIBIT NO. 110

alterations and/or repairs. After all, a house in an R-1-A zone may have a lot size in excess of 10,000 sq. ft. and could exceed the square feet in a building addition or alteration requiring a COO. The same potential for environmental impact exists whether or not a COO is required.

Landscaping, whether natural or created, plays a critical role in our environment. The hydrologic cleansing that occurs when stormwater rushes across an open grass field into a streambed or the control on the terrain exercised by a grove of trees is difficult to recreate in the manmade environment; however, the Office of Planning has begun to explore ways designed to help Mother Nature through eligible landscape elements and a related point system that will be calculated for each given lot. The landscape elements outlined in § 1503.9 resemble the format presented in the amenities chart for PUDS. This was an area the task force felt needed further consideration and beefing-up. Also, it appears the necessity for a land owner to replace removed trees is missing from this section.

Section 1505, Submittal Requirements for Green Area Ratio, is a well designed step-by-step process that should apply to buildings in all zones rather than limiting the requirement to those requiring a COO. Lot size may be the determining factor for inclusion in the GAR regulations for residential buildings not requiring a COO.

As noted earlier, the Green Area Ratio is critical to maintaining environmental stability as more and more of the District's land is developed. To ensure long-term GAR outcomes are realized, a timed reporting system for buildings and lots considered under this section of the code needs to be developed. Otherwise, there is little incentive for a property owner to maintain installed landscape features over the life of the project and this is especially important in the event property is sold. As an example, a green wall would be very easy to ignore if plants fail to return after several summers of heat and drought. One point that needs clarification is whether or not there would be occasion when a developer could transfer GAR requirements from one project to another and still receive credit.

The Committee of 100 supports the addition of the GAR text amendment to the zoning regulations. Areas of this chapter may need further refinement or additions but overall, this chapter will have long-term positive outcomes for the environment, the city and its residents.