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Mr. Anthony Hood
Chairman, DC Zoning Commission
441 4th Street, NW
Washington, DC 20001

Dear Chairman Hood and Members of the Commission:

The purpose of this letter is to provide some comments on the proposed zoning for St. Elizabeth's East Campus. While I am very pleased that official attention has been turned to this important site in Ward 8, I have some concerns with the proposal, which I would like to bring to the Commission's attention; I request that these modifications be made before the final approval is given.

1. The emphasis on historic preservation is very positive. I am pleased that many of the beautiful historic buildings on the campus are to be saved, and that several are targeted to be part of an innovation hub.
2. The density on the StE-8 and StE-11 is too low, and too much open space is set aside at this important location. My major concern is the proposal for substantial amounts of open space on either side of 8th Street east of Sycamore/Dogwood, and the corresponding very low density proposed for StE-8 (.4 FAR) and StE-11 (.7 FAR). I am certainly not opposed to preserving open space on the campus, but each of those parcels already has low-rise, historic buildings, with substantial amounts of green space around each of them. The very low density proposed on the two sites is especially puzzling because StE-7, right across Sycamore Street, is supposed to be the "MLK Neighborhood Center" with a mixture of ground floor retail and residential, yet the plan has it separated from the rest of the innovation hub of the campus by these large open spaces, making it less convenient for residents and workers at the CT Campus and nearby sectors to patronize the retail on StE-7 and across MLK Avenue. Keeping the density so low, and reserving such large parcels for open space also restricts the ability to construct new buildings that complement the historic structures that will house the university and/or innovation hub/incubator. Some of these new types of users may need more modern infrastructure, or larger floor plates than the small, older buildings can provide. It is difficult to say what the higher FAR should be, without knowing what the current FAR of the existing structures is, but the density should be sufficient to permit a 5 or 6 story building on each side of 8th Street.

ZONING COMMISSION
District of Columbia

CASE NO. 12-08

EXHIBIT NO. 34

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3. The density proposed for the parcel adjacent to the Congress Heights Metro is not sufficient, the zoning does not require preferred uses and the preferred uses in the adjacent parcel are focused away from Alabama Avenue. It is important that the greatest density and height on the campus is being proposed for StE-18, immediately adjacent to the Congress Heights Metro. However, I question whether sufficient critical mass is being provided here to complement the important development which has revitalized Alabama Avenue over the last decade. The Shops at Park Village and the Henson Ridge development, along with the gleaming new Turner Elementary, are important anchors just east of the Metro, and it is a bit disappointing that the Master Plan looked at St. Elizabeth's largely in isolation, with insufficient attention paid to creating what planners refer to as "livable, walkable communities." As one example of this, I note that section 3305 of the new zoning, while it requires preferred uses like restaurants and retail on StE-17, puts those uses on the Dogwood side, and ignores the Alabama Avenue frontage. (In fact, the design guidelines for sidewalk types on page 53 of the Master Plan call for narrow, residential-type sidewalks along Alabama Avenue, not wider, retail and pedestrian-oriented sidewalks. Even more puzzling, there are no preferred use requirements on StE-18, despite it being right on Alabama Avenue and next to the Metro. And, while it is the densest zoning proposed for the East Campus, it is still only 4.0 FAR. Isn't this an appropriate location for a mixed-use building, with retail on the ground floor serving the workers at the Hospital, as well as the neighbors and future residents/users of the campus, with a high-rise building above, providing either offices for local businesses and professionals, or residential units for those who want the convenience of living adjacent to the Green Line Metro? Certainly there is no reason to think that the market appeal of projects which provide opportunities to live and work near Metro in Northwest DC (and avoid the expense of owning and driving a car) is limited to areas west of the River. It is important for us to leverage the investment that the District and private developers will be making on St E's East to generate economic development, but it is also important that the development connects with, and doesn't turn its back on the neighborhood. Furthermore, regarding StE-17, why does this important site, right on Alabama Avenue and very close to the Congress Heights Metro, permit a higher FAR for above grade parking (2.0) than for actual development (.5)? StE-18, since it is at the Metro, and borders a major arterial and a cemetery, should be closer to a regional center density at 5 or 6 FAR. The density on StE 17 should also be increased.
4. While StE-7, the proposed neighborhood center, does require preferred uses, and puts them along the Avenue, the proposed building discourages pedestrian traffic from getting to the retail along the Avenue. At least on StE-7, the MLK Neighborhood Center, the required preferred uses are encouraged to be on the Martin Luther King Jr. Avenue side of the parcel, where they might help to revitalize the neighborhood retail on the west side of the Avenue at that point, and on both sides further south, and where the retail might serve potential patrons from the Coast Guard at the West Campus. However, I suspect that creating a "superblock" on StE-7 will discourage future residents, employees and students on the East Campus from getting to that retail. It seems to me we need to break up the mass, and provide access to and from MLK. I suggest an FAR of 3.0, keeping the 1.0 minimum requirement for residential, and permitting the height to go to 75 feet, to make it easier to create a separation between the buildings.
5. There should be higher density on StE-3, between MLK and Sycamore Drive. As some documents have noted, this is a major opportunity area to include office, residential and retail, and reinforce Martin Luther King, Jr. Avenue. It is also supposed to include structured parking. Therefore, the proposed 2.5 FAR seems very low, particularly given that it is not one of the parcels permitted by Section 3306.3 to have extra FAR for above grade parking. I urge the Commission to increase the FAR to at least 4.0 - 4.5, and to keep the preferred use requirements along the frontages named.

In short, here is my concern with the proposed zoning for the East Campus -- while we want to preserve green space and historic buildings, this site is a major economic development opportunity for the District, and we should take advantage of that opportunity by using the land wisely and efficiently, with sufficient density. Since the city can control the pace of development, we do not need to worry that, by placing relatively high levels of density on individual parcels, we will encourage overbuilding. However, if we permit development to go at too low a density, we will run the risk of using up long-term development potential, and find ourselves without a critical mass at any node to create a sense of place and vitality. It is true that, at this point, there is still a somewhat weak market. So we should focus on the area around the Metro station, where we can build on the energy already created along Alabama Avenue, but provide for sufficient height and density in other key areas of the campus so that we can accommodate the demand as it develops. The current low land prices and low commercial demand probably make it difficult to carry the cost of underground parking now, so the Commission should keep relatively low lot occupancies (which is the case with the proposed zoning) and the city should work with developers to site buildings so that above grade parking can be replaced later by new buildings with underground parking to serve the new and the older building as the market matures.

Thank you for the opportunity to present my concerns to the Zoning Commission. I have attached a copy of the zone map from the OP report, to make it easier to follow my comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Marion S. Barry, Jr.", with a stylized, cursive script.

Marion S. Barry, Jr.

c: The Honorable Vincent Gray, Mayor
 Mr. Victor Hoskins, Deputy Mayor, Economic Development
 Ms. Harriet Tregoning, Director, D. C. Office of Planning