

Petition for Zoning Map Amendment for Lot 808, Square 2586

**Submission of Keep Meridian Hill Green
to the Zoning Commission of the District of Columbia**

August 13, 2018

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I. SUMMARY AND PURPOSE

Keep Meridian Hill Green (KMHG) is an unincorporated non-profit civic association in Washington, D.C. KMHG supports responsible urban planning in the District of Columbia in accordance with environmental protections and D.C. zoning laws and regulations.

KMHG files this petition for a Zone Map Amendment to Lot 808 in Square 2568. Lot 808, which is located in the Meridian Hill Historic District, is currently split-zoned RA-2 and RA-4.

The RA-4 zoning on Lot 808 is inconsistent with various provisions of the Comprehensive Plan, including the Future Land Use Map (FLUM) and the Generalized Policy Map. Rezoning Lot 808 to RA-2 would advance the goals of the Comprehensive Plan's FLUM and the Generalized Policy Map, as well as the Framework Element, which states:

The residential character of neighborhoods must be protected, maintained, and improved. Many District neighborhoods possess social, economic, historic, and physical qualities that make them unique and desirable places in which to live. These qualities can lead to development and redevelopment pressures that threaten the very qualities that make the neighborhoods attractive. **These pressures must be controlled through zoning and other means to ensure that neighborhood character is preserved and enhanced.** (emphasis supplied)

KMHG's Proposed Zone Map Amendment is also consistent with the Comprehensive Plan's Land Use Element, Urban Design Element, Historic Preservation Element, and Mid-City Element.

II. EXISTING AND PROPOSED ZONING

Lot 808 is bordered by 16th Street NW on the east, Belmont Road NW on the south, and Crescent Place NW on the north. Directly to the west is the White Meyer House (1624 Crescent Place NW) on Lot 806, and beyond that, and slightly to the southwest, is the Meridian House (1630 Crescent Place NW) on Lot 809.

Lot 808 is currently split-zoned RA-2 and RA-4, with the portion along 16th Street located in the RA-4 Zone District and the remainder of the property located in the RA-2 Zone District. Lots 806 and 809 are also located in the RA-2 Zone District. Until the Zoning Regulations were updated in 2016, RA-2 was R-5-B and RA-4 was R-5-D.

Zoning Details	RA-2	RA-4
Description	Permits moderate and medium-density row houses and apartments	Permits medium to high density apartments
Minimum Lot Area (sq ft)	1800	1800
Maximum Lot Occupancy (%)	60	75
Maximum Height (ft)	50	90
Rear Yard Setback (ft)	15	15
Side Setback (ft)	4	4
Maximum Floor Area Ratio	1.8	3.5

The proposed Zoning Map Amendment would not adversely affect nearby or adjacent zone districts or properties. To the south is the Beekman Place Condominiums, a community of townhomes ranging from 2-4 stories in the RA-4 and RA-2 Zones. Directly to the north of Lot 808 is The Envoy, a 8-story apartment building in the RA-4 Zone. To the northwest is 1661 Crescent Place, a 6-story condominium building in the RA-2 Zone.

The proposed RA-2 Zone District is appropriate given that it is the zoning designation for a portion of Lot 808 as well as for the remainder of Square 2568.

III. COMPLIANCE WITH THE COMPREHENSIVE PLAN MAPS

Section 226.1 of the Framework Element of the Comprehensive Plan describes how to use the Comprehensive Plan’s maps:

The Generalized Policy Map and Future Land Use Map are intended to provide generalized guides for development and conservation decisions. Several important parameters...apply to their use and interpretation.

Section 226.1(d) provides one of these parameters:

The zoning of any given area should be guided by the Future Land Use Map interpreted in conjunction with the text of the Comprehensive Plan, including the citywide elements and the area elements...

A. Generalized Policy Map

The proposed amendment is consistent with the Generalized Policy Map of the Comprehensive Plan. The Generalized Policy Map identifies the project site as being within a Neighborhood Conservation Area, which is defined by the Comprehensive Plan as:

...[having] very little vacant or underutilized land. They are primarily residential in character. **Maintenance of existing land uses and community character** is anticipated over the next 20 years. Where change occurs, it will be **modest in scale** and will consist primarily of scattered site infill housing, public facilities, and institutional uses. Major changes in density over current (2005) conditions are not expected but some new development and reuse opportunities are anticipated...

The guiding philosophy in Neighborhood Conservation Areas is to **conserve and enhance established neighborhoods**. Limited development and redevelopment opportunities do exist within these areas but **they are small in scale**. The diversity of land uses and building types in these areas should be maintained and new development and alterations should be compatible with the existing scale and architectural character of each area. Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map. (emphasis supplied)

Rezoning the lot to RA-2 would be consistent with the definition of Neighborhood Conservation Areas. Allowing the lot to remain split-zoned with RA-4 would violate the provisions of the Generalized Policy Map by enabling greater density than anticipated by the Comprehensive Plan; enabling large-scale development that is more appropriate in a medium or high-density area; and enabling development that exceeds the existing scale and architectural character of the area.

B. Future Land Use Map (FLUM)

The Comprehensive Plan states that densities in Neighborhood Conservation Areas are guided by the Future Land Use Map (FLUM), which reflects future density for residential and commercial areas. The FLUM is part of the Comprehensive Plan's Framework Element and "carries the same legal weight as the Plan document itself".

The FLUM designates Lot 808 for Moderate Density Residential use. The Framework Element defines Moderate Density Residential as:

... the District's row house neighborhoods, as well as its low-rise garden apartment complexes. The designation also applies to areas characterized by a mix of single family homes, 2-4 unit buildings, row houses, and low-rise apartment buildings. In some of the older inner city neighborhoods with this designation, there may also be existing multi-story apartments, many built decades ago when the areas were zoned for more dense uses (or were not zoned at all). The R-3, R-4, R-5-A Zone districts are generally consistent with the Moderate Density Residential category; the R-5-B district and other zones may also apply in some locations.

Because the R-5-B Zone District is now the RA-2 Zone District (under the 2016 Zoning Regulations), rezoning Lot 808 to the RA-2 Zone District would be consistent with the FLUM and the Moderate Density Residential definition.

To allow Lot 808 to remain split-zoned RA-4 would be inconsistent with the Comprehensive Plan. Nothing in the Comprehensive Plan suggests that the RA-4 Zone District is compatible with Moderate Density Residential. In fact, the Framework Element states that RA-4 is compatible with High Density Residential:

High Density Residential: This designation is used to define neighborhoods and corridors where high-rise (8 stories or more) apartment buildings are the predominant use. Pockets of less dense housing may exist within these areas. **The corresponding Zone Districts are generally R-5-D and R-5-E**, although other zones may apply. (emphasis supplied)

The importance of zoning as a tool for implementing the Comprehensive Plan, particularly the FLUM, is discussed in the Implementation Element of the Comprehensive Plan.

- ***Policy IM-1.3.2: Zone Map Consistency:*** Consistent with the Home Rule Charter, ensure that the Zone Map is not inconsistent with the Comprehensive Plan Future Land Use Map. Make appropriate revisions to the Zone Map to improve its alignment with the Future Land Use Map and to eliminate clear inconsistencies.
- ***Policy IM-1.3.3: Consultation of Comprehensive Plan in Zoning Decisions:*** ...Decisions on requests for rezoning shall be guided by the FLUM read in conjunction with the text of the Plan (Citywide and Area Elements) as well as Small Area Plans pertaining to the area proposed for rezoning.

KMHG's Proposed Map Amendment reflects the anticipated land use on the FLUM and is consistent with the Comprehensive Plan. In accordance with the Comprehensive Plan, Lot 808 should be rezoned to RA-2 in order to comply with the Moderate Density Residential FLUM designation.

IV. MERIDIAN HILL HISTORIC DISTRICT

Lot 808 is located within the Meridian Hill Historic District, which was listed in the District of Columbia Inventory of Historic Sites in 2014. The Meridian House and White Meyer Mansion, on Lots 809 and 806 respectively, are individually listed in the National Register of Historic Places. The National Park Service (NPS) describes the district as follows:

With its important collection of grand Beaux Arts-style mansions, foreign legations, luxury apartment buildings and religious edifices to either side of a formal park, the Meridian Hill Historic District provides a unique illustration of how the City Beautiful Movement inspired the development of Washington as an international city beyond the National Mall. The historic district occupies a prominent site at an important rise in the topography of the city and includes the stretches of 15th and 16th Streets from Florida Avenue on the south to beyond Columbia Road on the north, including the magnificent neo-Classical style Meridian Hill Park. The architectural sophistication of the buildings of Meridian Hill reinforces the urbanistic importance of 16th Street as a major avenue of the L'Enfant Plan emanating from the city's symbolic center. More particularly, the historic district reflects the singular imagination and influence of Mary Foote Henderson and her husband, Senator John Brooks Henderson in creating and beautifying 16th Street and Meridian Hill as a prestigious enclave during the late 19th and early 20th centuries. The district also reflects the contributions of notable architects, diplomats, developers and, of particular note, other women of means, in creating this exclusive area.¹

The historic designation recognizes the special architectural and landscape characteristics of the area. The White Meyer Mansion and the Meridian Mansion are contributing structures in this District, and were described as follows in the nomination petition for Meridian Hill's historic designation:

The White-Meyer House and Meridian House, located at the southern end of the historic district, are the most private of the area's mansions. Both houses, designed by John Russell Pope a decade apart from each other, occupy large lots and are enclosed by walls that obscure the houses from public view and contribute to an elite enclave-like feeling of Sixteenth Street in general and Crescent Place in particular. The two-story, five-bay brick White-Meyer House, built in 1912 for retired diplomat Henry White and his wife, is stylistically reminiscent of an English Georgian country house. Indeed, the extravagant interior detailing includes some original Georgian-era mantels brought over from England.

Meridian House, commissioned by Irwin Boyle Laughlin, steel magnate and a friend of Henry White who built the White-Meyer House, was erected almost ten years later, just east of the White-Meyer House. The Meridian House property extends west to 17th Street and south to Belmont Place and is enclosed by high concrete walls with limestone facing. Hiding behind these walls is the limestone-clad French neo-Classical manse that appears to rise only two stories, but

¹ See National Park Service: National Register of Historic Places Program, at <https://www.nps.gov/nr/feature/places/14000211.htm>, visited August 8, 2018.

actually has four, including a sunken basement level of services and an attic-level servants' quarters within the mansard roof. Built into the natural rise of the terrain, both the White-Meyer and Meridian houses enjoy landscaped gardens at the rear with exceptional panoramic views of the city to the south that historically would also have included a view of the Henderson's residence.²

The *Meridian Hill Historic District Design Guidelines* ("the Guidelines") state that "[t]he mansions and churches of Meridian Hill represent the most significant aspect of the neighborhood's built environment and should be treated with the highest standards of sensitivity and care".

The Guidelines also reinforce the importance of protecting historic views in any future developments, stating that the Meridian House and White Meyer Mansion "were sited to take advantage of views to and through the park along 15th and 16th streets". The Guidelines indicate that shorter structures should be considered in order to preserve historic viewpoints.

One of the four design principles contained in the Guidelines states:

Meridian Hill Park is the centerpiece of the neighborhood. Its physical and visual centrality necessitates that alterations to surrounding buildings take into consideration views to and from this nationally significant urban garden.

Although the Guidelines do not speak to the appropriate zoning designation for this Lot, they anticipate that any structure within the Historic District will be a size and height that enhances and preserves these views: "new buildings should be designed to respect the character of the district and be sensitive to their immediate surroundings... particular attention should be paid to their siting, massing, size, scale and materials".

Additional support for this Zone Map Amendment comes from the *District of Columbia Historic Preservation Guidelines for New Construction in Historic Districts*.

- **Guideline 8.1:** While a new building does not necessarily need to be exactly the same height as its neighbors to be compatible, it should be designed to respect existing building heights.
- **Guideline 8.2:** Typically, if a new building is more than one story higher or lower than existing buildings that are all the same height, it will be out of character.

A structure built to the limits of RA-4 zoning would impact the views between the mansions and Meridian Hill Park and threaten the integrity of the historic district.

² National Register of Historic Places Registration Form, application, available at <https://www.nps.gov/nr/feature/places/pdfs/14000211.pdf>

Rezoning Lot 808 to RA-2 would ensure that any future development is consistent with these Guidelines.

V. COMPREHENSIVE PLAN – CITY WIDE ELEMENTS

Amending the Zoning Map for lot 808 is consistent with other Comprehensive Plan policies and actions, specifically Citywide Elements including the Land Use Element, Urban Design Element, Historic Preservation Element, Mid-City Element, and Implementation Element.

A. Land Use Element

The Land Use Element of the Comprehensive Plan integrates the policies of all other District elements and it should be given greater weight than the other elements. Themes of the Land Use Element encourage “...efficient use of land resources to meet long-term neighborhood, citywide and regional needs...or to improve the character and stability of neighborhoods in all parts of the city...”.

- ***Policy LU-1.2.7: Protecting Existing Assets on Large Sites:*** Identify and protect existing assets such as historic buildings, historic site plan elements, important vistas, and major landscape elements as large sites are redeveloped.
- ***Policy LU-1.4.3: Zoning of Infill Sites:*** Ensure that the zoning of vacant sites is compatible with the prevailing development patterns in surrounding neighborhoods.
- ***Policy LU-2.1.1: Variety of Neighborhood Types:*** Maintain a variety of residential neighborhood types in the District, ranging from low-density, single family neighborhoods to high-density, multi-family mixed use neighborhoods. The positive elements that create the identity and character of each neighborhood should be preserved and enhanced in the future.
- ***Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods:*** Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment.

This proposed amendment would not preclude future development, but would ensure that any future development is consistent with the Comprehensive Plan.

B. Urban Design Element

The Urban Design Element focuses on D.C.’s “physical design and visual qualities.” The Proposed Map Amendment would advance the goals set forth in the Urban Design Element, especially as they relate to protecting the District’s historic design legacy and enhancing historic neighborhoods, as well as respecting natural topography and landform.

- **Policy UD-1.2.4: View Protection:** Recognize and protect major views in the city, particularly characteristic views of city landmarks, and views from important vantage points. Recognize the importance of views to the quality of life in the city and the identity of Washington and its neighborhoods.
- **Action UD-1.2.B: Creating View Plane Regulations:** Conduct a review of desirable views, creating view plane diagrams, affording analysis of desired possibilities, and developing zoning regulations accordingly.
- **Policy UD- 2.2.2: Areas of Strong Architectural Character:** Preserve the architectural continuity and design integrity of historic districts and other areas of strong architectural character. New development within such areas does not need to replicate prevailing architecture styles exactly but should be complementary in form, height, and bulk.
- **Policy UD- 2.2.7: Infill Development:** Regardless of neighborhood identity, avoid overpowering contrasts of scale, height and density as infill development occurs.
- **Policy UD-2.2.9: Protection of Neighborhood Open Space:** Ensure that infill development respects and improves the integrity of neighborhood open spaces and public areas. Buildings should be designed to avoid the loss of sunlight and reduced usability of neighborhood parks and plazas. DCMR 10A-910.18.

C. Historic Preservation Element

The Historic Preservation Element focuses on the importance of protecting historic properties, and key to that process is effective review of rehabilitation and new construction. The Historic Preservation Element also focuses on the importance of historic landscapes and open space.

- **Policy HP-2.4.3: Compatible Development:** Preserve the important historic feature of the District while permitting new infill development. Within historic districts, preserve the established form of development as evidenced by lot coverage limitations, yard requirements open space, and other standards that contribute to the character and attractiveness of those areas. Ensure that new construction, repair, maintenance and improvements are in scale with and respect historic context through sensitive siting and design and the appropriate use of materials and architectural detail.
- **Policy HP-2.4.4: Suitability to the Historic Context:** ...Exercise greater restraint in residential historic districts and areas with a clear prevailing development pattern or architectural style. Allow greater flexibility where the inherent character of historic properties can accommodate greater intervention or more

dramatic new design, for example, in non-residential areas and in areas without a significant design pattern.

- **Action HP-2.4.C: Zone Map Amendments in Historic Districts:** Identify areas within historic districts that may be “overzoned” based on the scale and height of contributing buildings, and pursue rezoning of such areas with more appropriate designations.
- **Policy HP-2.5.2: Historic Landscapes:** Preserve the distinguishing qualities of the District’s historic landscapes, both natural and designed. Protect public buildings and monument grounds, parks and parkway systems, government and institutional campuses, gardens, cemeteries, and other historic landscapes from deterioration and incompatible development.
- **Policy HP-2.5.6: Historic Open Space:** Retain landscaped yards, gardens, estate grounds, and other significant areas of green space associated with historic landmarks whenever possible. If development is permitted, retain sufficient open space to protect the setting of the historic landmark and the integrity of the historic property.

D. Mid-City Area Element

Lot 808 is part of the Mid-City Area and this Zone Map Amendment is consistent with the policies of the Area Element, namely:

- **Policy MC-1.1.1: Neighborhood Conservation:** Retain and reinforce the historic character of Mid-City neighborhoods, particularly its row houses, older apartment houses, historic districts, and walkable neighborhood shopping districts. The area’s rich architectural and cultural history should be protected and enhanced.
- **Policy MC-1.2.6: Mid-City Historic Resources:** Protect the historic resources of the Mid-City area. . . Meridian Hill/Malcolm X Park and the area around it shall be managed to preserve historic vistas and view corridors, as well as historic park features.

VI. COMMUNITY SUPPORT

There is strong consensus in our community to pursue appropriate zoning for this lot. Concerned residents share the prevailing belief that the scale of future development on the lot should be compatible with the historic mansions and with the Comprehensive Plan’s Future Land Use Map and Generalized Policy Map.

Attached is a paper petition containing 97 signatures (Exhibit A) and a screenshot of a Change.org petition that has been signed by 199 neighbors and concerned individuals (Exhibit B). In total, we have collected 296 signatures. The Change.org petition can be

viewed at: <https://www.change.org/p/tell-zoning-commission-to-rezone-meridian-hill-in-accordance-with-dc-law>.

A website was also developed to inform area residents of our concerns and our goals. The website is available at <http://keepmeridianhillgreen.org>.

In addition, KMHG has met with Jennifer Steingasser and Joel Lawson in the Office of Planning to discuss this petition. KMHG has also discussed this petition with members of Advisory Neighborhood Commission 1C, and plans to present the petition at the ANC1C meeting on September 5, 2018.

VII. WAIVER OF FEES

In accordance with Subtitle Z, Chapter 16, KMHG requests exemption from filing and hearing fees associated with this petition to amend the Zoning Map, as KMHG is “a citizens’ association or association created for civic purposes that is not for profit.”

VIII. CONCLUSION

For the foregoing reasons, KMHG submits that the enclosed petition meets the requirements set forth by Subtitle Z, Chapter 3. It is consistent with the Comprehensive Plan and the Meridian Hill Historic District Design Guidelines.

Accordingly, KMHG respectfully requests that the Zoning Commission set this petition for a Zone Map Amendment down for a public hearing at the earliest possible date.

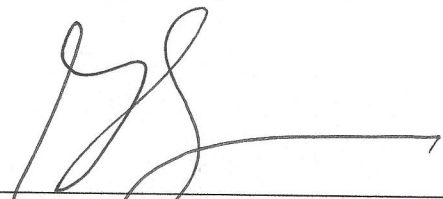
CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the petition and all accompanying documents were delivered by first-class mail to the following addresses on August 13, 2018.

Jennifer Steingasser (2 copies)
Office of Planning
1100 4th Street SW, Suite 650E
Washington, DC 20024

ANC 1C (8 copies)
PO Box 21009 NW
Washington, DC 20009

Amanda Fox Perry, ANC1C08
1664 D Beekman Place NW
Washington, DC 20009



Gary Youngblood
Keep Meridian Hill Green