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June 27, 2002

Ms. Carol Mitten, Chair
DC Zoning Commission
Suite 210
441 4th Street NW
Washington, DC. 20001

By Fax (727-6072)

Re: Case #02-15 (Text Amendment--Providing Matter-of-Right Use in the R-1 Zone District for Public Park and Recreational Uses)

Dear Ms. Mitten:

The Sierra Club has great concerns over the proposed amendments to 11 DCMR. In sum, we don't agree that the D.C. Dept. of Parks and Recreation should be given matter-of-right authority to build four-storey structures, covering up to 60% of the land area, in D.C. parks.

These are the two aspects of the proposal that disturb us. A four-storey structure may not be consequential in the context of the Commission's usual matters -- involving residential or commercial parts of the City. When built in a park, however, such a structure is a very big deal. There are very few such structures in D.C. parks. Indeed, there are very few such structures in the City's major federal parks, e.g, Anacostia, Rock Creek, Glover Archbald, Battery Kemble, Fort DuPont, etc. We think that matter-of-right construction authority should be limited to 15- or 20-foot structures – e.g., the typical recreation center.

The proposed 60% limit on lot occupancy is equally troubling. Building a structure of such a scale would naturally have an enormous impact on any parcel of parkland. This is not to say that such a structure should never be built, but it should not be built as a matter-of-right. If nothing else, such structures should have a footprint no larger than 2,000 square feet.

The Sierra Club has long had a special relationship with the parkland in the vicinity of RFK Stadium. For the most part our concerns in that area have involved federal park land. However, in light of the recent transfer of title – from the federal government to the City – of Kingman and Heritage Islands, the Parks and Recreation Department now has active control over much of the green space in this area.

"For Our Families, For Our Future"

ZONING COMMISSION
District of Columbia
Case 02-15
Exhibit 10

ZONING COMMISSION
District of Columbia
CASE NO.02-15
EXHIBIT NO.10

We think it reasonable to ask that the Department obtain a variance before building large facilities on these or similar tracts of land.

Thank you. Best regards.

James B. Dougherty
Chapter Legal Chair