GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF PLANNING

Office of the Director

RECEIVED
D.C. OFFICE OF ZONING
2002 DEC -2 PM 2:53

MEMORANDUM

TO: D.C. Zoning Commission

FROM: Andrew Altman
Director

DATE: December 2,2002

SUBJECT: Supplemental Report for **Text Amendments to Permit Public Recreation and Public Community Center uses as a matter-of-right in the R-1 zone**; initiated by the Office of Planning on behalf of the DC Parks and Recreation Department.

This is a supplemental report to the Office of Planning's report dated January 7, 2002. At the July 2002 public meeting, the Zoning Commission (Commission) requested the Office of Planning (OP) to provide the following additional information for consideration:

1. Revised definition for public recreation and community center;
2. Appropriate lot occupancy and height caps;
3. Size of facility, impact to the immediate community and threshold for Board of Zoning Adjustment special exception review;
4. Allowable uses for facilities on National Park Service land;
5. Parking and loading requirements;

In response to the Commission's request for additional research and analysis, OP researched other jurisdictions and consulted with the Department of Park and Recreation (DPR) staff and consultants. OP attempted to balance the Commission's concerns, DPR's mandate of constructing new and renovating old facilities, the existing regulatory framework, limited opportunities to purchase additional land, and the demand for recreational facilities by the citizens of the District of Columbia.

Against this backdrop, OP also considered the fact that most of the facilities affected by the text amendments are existing buildings. DPR has approximately 20 capital projects pending. (See attached chart provided by DPR of pending capital projects.) The overriding concern for OP was to minimize adverse impacts on adjacent residential neighborhoods, ensure the preservation of open space by preventing the over-

ZONING COMMISSION
District of Columbia
Case 02-15
Exhibit 46

ZONING COMMISSION
District of Columbia
CASE NO.02-15
EXHIBIT NO.46

development of open space, and to allow DPR to proceed on schedule with its capital improvements program.

1. Revised definition for public recreation and community center

The Commission requested that OP draft a proposed definition for public community center and public recreation center. After discussions with DPR and reviewing citizen priorities identified in the recently released Strategic Neighborhood Action Plans, OP now proposes one all inclusive definition for public recreation and community centers for reasons that will be discussed below.

> Proposed Definition for Public Recreation and Community Center
> A public recreation or community center is an area, place, structure, or other facility under the jurisdiction of a public agency that is used for community recreation activities. A public recreation or community center may provide a broad range of health and wellness, social, cultural, arts and crafts, educational classes and services, and may include but not be limited to, auditorium, gymnasium, meeting space, open space, playground, playing court, playing field, and swimming pool.

According to DPR, its new facilities will be designed as multipurpose and inter-generational facilities that will include educational and recreational type activities at the same facility. In the past, recreation centers were more one-dimensional facilities, offering either recreation or educational / community center type activities. Limited resources and consumer choice now necessitate a multi-functional facility that provides a broad range of services for children, seniors, and families at one site. As a result, DPR's future capital projects will include construction of more multi-purpose type facilities.

It should also be noted that DPR has no formal criterion to distinguish between a recreation and community center. Prior to constructing a new facility, DPR initiates a community process to solicit resident input on programs and activities. As a result, all new facilities are designed to meet the needs of the citizens. OP has requested that DPR provide the Commission a description of its community engagement process.

OP proposes regulations based upon the size of the facility and types of activities occurring at the facility to provide a more accurate means of measuring and minimizing adverse impact on surrounding neighborhoods.

a) Section 209: Community Service Centers

The Commission also expressed concern that the proposed text amendments would be in conflict with Section 209, Community Service Centers. In OP's opinion, no conflicts exist because section 209 applies to community centers operated by non-profits for the purpose of "...improving the social or economic well-being of the residents." These centers also allow activities that are not provided at municipal operated facilities such as job training and consumer cooperatives.

2. Lot Occupancy and Height

OP is very sensitive to the need for preservation of open space and the need to balance open space with the need for recreational facilities. After careful consideration, research, and consultation with DPR, OP proposes a 40% lot occupancy as a matter of right for public facilities in all residential zones. OP believes that a 40% lot occupancy in residential districts takes into consideration DPR's physical needs and development policies as well as the Commission's concerns about preservation of open space. OP further recommends that the city's recreation facilities have the same development flexibility as other uses within commercial zone districts and that there no special lot occupancy for recreational facilities in commercial districts.

In reaching this recommendation, OP first reviewed DPR's inventory of current and proposed facilities and discovered that most are well below the 40% cap. Second, OP considered the fact that the standard lot occupancy for low-density residential districts such as R-1, R-2, and R-5-A is 40%. OP felt that the maximum 40% lot occupancy would maintain the same proportionate scale of building to land as is allowed for other building within these low-density, primarily single family zones. In the moderate- and high-density residential zones of R-3 through R-5-E, where the residential lot occupancy increases to 60% and 75%, OP concluded through discussion with DPR that 40% continues to be an appropriate figure because in these zones where the typical residential density is higher and the recreational center can serve to balance that with a low-density level of open space.

Finally, OP considered the following DPR's concerns and policies: 1) DPR has a policy of maintaining the maximum amount of open space as possible; 2) DPR has a very extensive community engagement process; and 3) DPR's need to avoid situations in which it would be required to purchase additional land in order to meet new development standards. After considering all these factors, OP was reluctant to establish a new lot occupancy that might unduly restrict the flexibility of DPR to develop public recreation centers.

OP also considered the Commission's concerns with respect to height limitations for DPR's facilities. Again, OP reviewed DPR's current and proposed facilities and weighed the need for open space with limited opportunities to purchase additional land and recommend a 45 feet limitation on height in all residential districts. This height is compatible with the low-density of the R-1 and R-2 zones and provide openness in the moderate and high-density zones where the height of buildings can reach 90 feet as a matter-of-right.

The table below illustrates OP's revised height and lot occupancy recommendations. The items in bold represent changes from prior OP recommendations.

Matter-of-Right Uses	Height					Floor-Area -Ratio	Lot Occupancy	Parking Standards
	R-1/ R-2	R-3/ R-4/ R-5A	R-5B	R-5C	R-5D			
SF Dwelling	40	40	50	60	90	None prescribed	60%	1 per unit
Churches	60	60	60	60	60	None prescribed	60%	1 per 10 seats
Public School	60	90	90	90	90	R1,R2, R5A: 0.9 R3,R4,R5B/C/D/E: 1.8 All other: 3.0	60% plus	2 per 3 employees[2]
PUBLIC Rec & Community Centers	**45**	**45**	**45**	**45**	**45**	**R1,R2, R5A: 0.9 R3,R4,R5B/C/D/E: 1.8 All other: 3.0**	**R1-R5E: 40% All other: 100%**	**See below**

3. Provide analysis and recommendations on issues related to size of facility and impact to the immediate community.

a) Size or square footage of facility and public review.

OP agrees that larger facilities have greater impact on neighborhoods in the immediate vicinity of these facilities. Typically, the impact results from events that attract large crowds such as sporting events. In these instances, OP finds that the primary impact is on parking. OP also finds that facilities that provide the means for large crowds such as bleacher seats are an appropriate method to gauge and control adverse impact.

OP believes that the Commission's concerns about the preservation of open space are addressed because lot occupancy and FAR serve to limit the relative size of a potential structure in relation to the size of a lot. As stated above, larger facilities with areas for large assembly typically serve a much broader area than the immediate neighborhood in which the facility is located. According to DPR, most facilities are designed to serve the immediate area. However, OP believes that requiring BZA approval for larger facilities and facilities with area for large assembly is the appropriate means of minimizing impact. Therefore OP recommends that lot occupancy and FAR serves as the threshold for requiring BZA review.

DPR also agrees that this provision addresses the concern about a threshold for public review and their attempt to balance 1) the need for efficiency to move their projects forward, 2) the need to balance the structural and open space activities, and 3) the need for public input on high impact type uses.

b) Impact of indoor activities versus exterior areas and outdoor recreation such as soccer field and large crowd type of events.

The primary impact from large outdoor activities such as baseball, soccer, and basket ball is parking. OP recommends that additional parking be required for facilities with bleachers based upon the number of seats and for playing fields as discussed below.

c) Kitchen Facilities.

According to DPR, all centers have only pantry type kitchen facilities but do not have any commercial type cooking equipment.

4. Restrictions for facilities on National Park Service land

Recreational facilities are owned by NPS, DPR, and District of Columbia Public Schools. Based upon OP's research and discussions with DPR, the only restrictions on use of National Park Service (NPS) land under the jurisdiction of DPR is that the land and facilities must be used for recreation, education, and related purposes. Uses such as job training have typically not been allowed. The typical conflict is over what types of activities are considered "educational." OP was unable to obtain additional information related to how educational uses are interpreted by NPS but concluded in discussions with DPR that the issue is resolved through lease agreements involving NPS lands and does not need to be codified in the zoning regulations.

5. Parking and Loading Requirements

OP submits the following loading requirements as proposed by the District Division of Transportation (DDOT) by report dated July, 12, 2002. DDOT determined that because DPR facilities have no heavy or frequent deliveries and no large truck deliveries, the loading requirements should be applied as follows:

a) *Loading Requirement*

	Minimum number and size of loading berths required.	Minimum number and size of loading platforms required.	Minimum number and size of service/delivery loading spaces required.
With more than 30,000 ft. of gross floor area in all districts.	NA	NA	1 @ 20 feet deep

b) Parking Requirements

In OP's opinion, the single greatest potential adverse impact from these facilities on any adjacent community is parking. Parking requirements should be based upon size of facility and activities which attract from a broader community than the surrounding area. OP recommends that parking requirements are calculated based upon the following chart:

	Current Parking Requirements	***OP Proposed Parking Requirements***	***OP Proposed Parking Requirements***
	Recreation or Community Center Use	*Bleachers (swimming pool, basketball, or ball field)*	*Ball Fields, Tennis Courts, Basketball courts (w/o bleachers)*
All Districts	1 per 2000 s.f. of bldg. or use.	1 per 2,000 sf. of non-bleacher space plus 1 space for each 12 seats of occupancy capacity (plus 1 seat for each 20 seats above 700). If seats are not fixed, each seven square feet usable for seating or 18 inches of bleacher/bench space shall be considered 1 seat.	Ball fields or basket ball courts 5 spaces per ball field Tennis Courts: 1 space for every 2 courts.

For centers where there are no bleachers but there is more than one exterior ball field . OP recommends a parking standard of 1 space for 2,000 interior square feet, a minimum of 5 spaces for each ball field, and 1 space for every 2 tennis courts.

Currently, DPR calculates parking for recreational buildings or use as per section 2101 at 1 parking space for every 2,000 square feet. In addition, DPR typically provides parking in excess of the requirement based upon community request, available land, topography, and activities at the site. See the comparison chart below showing calculations for parking using section 2101, examples of the actual amount of parking spaces proposed by DPR for two of its facilities, and OP proposed requirements.

	Current Requirement §2101 1@ 2,000 sf.	**Actual spaces being provided by DPR**	**OP Proposed Parking Requirement** 1 @ 2,000 non-bleacher space + 1 for every 12 bleacher seats.
Takoma RC 47,363 sf & 650 bleacher seats & indoor pool	24	82	74 (18/56)
Emery RC 29,825 sf & 270 bleacher seats & indoor basketball courts	15	29	28 (5/23)

6. Board of Zoning Adjustment Approval for Special Exception Threshold

For all of the reasons discussed above, OP recommends the following special exception threshold:

- Lot occupancy over 40% in R zones,
- FAR in excess of 0.9 in R-1, R-2 and R-5-A zones,
- FAR in excess of 1.8 in R-3, R-4, R-5-B, R-5-C, R-5-D and R-5-E zones,
- FAR in excess of 3.0 in all other zones,
- Relief from parking requirements for high impact uses such as bleachers and ball fields.

In conclusion, OP reached the thresholds shown above after careful consideration of the existing regulatory framework, surveying other jurisdictions, consultation with DPR staff and consultants, and reviewing DPR inventory of existing and proposed capital projects. Again, OP's goals was to minimize adverse impacts on neighborhoods located near these facilities by providing appropriate regulatory and public review, assist DPR with the orderly processing of the largest number of capital projects in over 25 years, and to address the concerns of the Commission such as the preservation of open space.

ATT: Chart of proposed capital projects

AA/vr

Jair Lynch Consulting/ Alpha Corporation - A Joint Venture

Project Sizes and Lot Occupancies

Lot Size

Ward	Project	Address	Legal Description	Building (Sq. ft.)	% Lot Occupancy	
1	Banneker Comm. Center	2500 Georgia Ave., NW	Reservation 506	32.865 11.9 ACRES 517,057 sf.	21.0	
1	Girard Street Playground	Girard & 15th Street, NW	Square 2667, Lots 68-71			
5	Brentwood Rec. Center	15th & Downing Sts., NE	Reservation 673	4,457 1.2 ACRE	8.5	
5	Trinidad Rec. Center	Childress& Holbrook Sts., NE	Reservation 615	8,911 5.6 ACRES	7.0	
7	Ft. Davis Comm. Center	1400 41st Street, SE	Reservation 713	13.459 4.9 ACRES	18.8	
7	Hillcrest Rec. Center	45th & Denver Sts., SE	Reservation 627	20,154 13.7 ACRES 698,596 sf	3.0	
7	Kenilworth Rec. Center	4300 Anacostia Ave., NE	Reservation 343, portion	Still in design 422,532 sf	tbd	
1	Parkview Comm. Center	Warder St., & Otis Place, NW	Square 3032, Lot 1	5,166 1.5 ACRE 63,162 sf	11.0	
2	Greenleaf Rec. Center	1200 Delaware Ave., SW	Reservation 68 – 69	16,800	20.0	
4	Emery Rec. Center	Georgia & Madison St., NW	Square 2988	20,000 8.3 ACRES 361,983 sf	5.0	

New

Lot Size

Ward	Project	Address	Legal Description	Building (Sq. ft.)	% Lot Occupancy	
4	Takoma Rec. Center	Third & Van Buren Sts., NW	Reservation 377	51,000 22 Acres 953,053 sf.	29.0	
6	Capitol East Natatorium	635 North Carolina Ave., SE	Reservation 872	23,000	52	
4	Lamond-Riggs Recreation Center	Kansas & Tuckerman St., NW	ON HOLD		ON HOLD	
2	Kennedy Rec. Center	Seventh & P Sts., NW	Square 446	n/a 3.5 Acres 152,460 sf.		
5	North Michigan Park	13th & Emerson Sts., NE	Reservation 696	OPM – still in design	→ 3.4 Acres 103,672 sf.	
5	Turkey Thicket Rec. Ctr.	10th & Michigan Ave., NE	Reservation 496	38,500 9.6 Acres 418,175 sf.	8.4% Ball Fields 249,000 sf	
6	Sherwood Rec. Center	10th & G Sts., NE	Reservation 552	20,050 85,813 sf.	17.0	