The COMMITTEE of 100 on the FEDERAL CITY
founded 1925

September 18, 2003

Ms. Carol Mitten, Chair
Zoning Commission
441 Fourth Street, N.W.
Washington, D. C. 20001

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Madam Chair:

Re: Case 03-06 Southeast Federal Center Zoning Overlay

The proposal for this zoning overlay is intended to address a number of goals with which the Committee of 100 on the Federal City is strongly supportive: encouragement of healthy residential neighborhoods, constructive use of and access to the waterfront for the people of the District and visitors, and planned development of related parcels.

We have reservations about a number of elements intended to meet these goals, however, and about some policies included as assumptions.

In the latter category is the OP argument that the higher residential densities for the project are needed to meet the goal of 100,000 additional district residents. It is not clear to us that this goal has been endorsed in any formal policy setting by either the Council or the Commission.

In our earlier testimony in connection with the Affordable Housing report, we questioned whether such a goal can be adopted without accompanying mechanisms for assessing the amount of support service a project will require, the likelihood of bringing taxable residents to the area, and the planned distribution of this 20% increase in District population. We have already seen the educational needs of families that are to be attracted to the Capper-Carrollsburg PUD left out of the applicant's planning for that project. It carries over to this proposal, with no assessment of what services the residents might require. We ask the Commission to look carefully at this particular zoning proposal, and at the overall policy and any need for a more complete statement of policy before accepting the 100,000 "number" as justification for zoning decisions.

As to the Commission's review of the building design of every block along M Street, we have some reservations about whether such a standard would be defensible for projects developed "of right" once zoning is established. We would be particularly troubled in connection with review of 4th Street, which does not even have the protection of the standards of the GSA RFP, as we understand it.

We very much agree with the OP's report in connection with the need for through streets to break up the mass of buildings, and for the need to add alleys for servicing of buildings. This is particularly important because of our concerns about the massing and height of the buildings allowed in the proposed zoning scheme. Nearly every site is eligible for 110' either of right or as a special exception. Experience with the nearby Capitol Gateway is not reassuring; setting a 90' height produced, as the first application, considerably greater height.

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District of Columbia
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Exhibit 51

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District of Columbia
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EXHIBIT NO.51

We are also concerned that the New Jersey Avenue vista be retained, around and past the WASA station. While there is no proposal for the WASA site included in the current overlay, we raise the concern so that adjacent parcels may be reviewed with this goal in mind.

We understand the desire for the fullest development envelope the applicant can achieve. But we are concerned about creating "walls along the water," relegating the best of views to the office occupants, rather than making them part of the neighborhood ambiance. Consistently in proposals for this developing region of the southeast, residential and neighborhood concerns seem to be subordinated to commercial needs. The very goal that OP cites (on page 4, last bullet) to "provide for a 'stepping down' of building height towards the park and the waterfront" does not reconcile with consistent access to 110' heights from west to east.

We continue to have concerns about the elasticity of the Waterfront Open Space zoning. All the sentiments expressed by OP with regard to the W-O site are welcome, but we would ask the Commission to look very carefully at the definitions for "recreational" uses and what they might allow. Inasmuch as this W-O parcel, along with parcel Q, represent the only sites less than 110' of right or by special exception, their development will have very large impact on the overall sense of this entire district.

An additional area of concern, not addressed in the documents we have seen, is the potential for creating not a waterfront park but a watering hole. The experience of Washington Harbour is instructive. Virtually all retail spaces are taken by ABC establishments. This makes living in the residential units above intolerable because many, many hundreds of people occupy the "public" space into the small hours. Until recently, the adjacent "parkland" was frequently the site for "barbecue bake-offs" that attracted more thousands of people (and great quantities of beer, overwhelming lavatory facilities). Some refer to this as "enlivening" the waterfront; it does not make for residential neighborhoods.

Perhaps the Commission could include some limit on the proportion of ABC establishments permitted in the commercial space being so intentionally created, especially along the tempting public space.

We would also ask both the Commission and OP to look at the policy DDOT seems to recommend in most new cases (though their report was not in the documents we reviewed; it was required in the Capper-Carollsburg PUD). This involves spacing street lights at intervals of 30' on center. We have attached several photographs of what such a scheme produces in real life. There is no space for street trees, the lights on the tall poles put them at second-floor bedroom level, wholly inappropriate for townhouse-type structures. The number of fixtures are not needed for safety; adequate light levels can be accomplished easily by contemporary bulbs. This oversaturation of poles changes the character of the street, limits other streetscape options, and compels the District to pay for lighting unneeded fixtures in perpetuity (along with other maintenance and upkeep).

Sincerely,

Barbara Zartman

Barbara Zartman
Vice Chair