Testimony of Barbara Zartman, Vice Chair and
Zoning Subcommittee Chair
Committee of 100 on the Federal City

July 28, 2003

Case No. 03-12 and 03-13

The Committee of 100 joins, of course, in support of the overall goal of providing more affordable housing for those most in need, the goal of replacing badly distressed public properties, and the goal of offering a mix of housing opportunities in viable communities that meet broad needs.

Let me make the point in an extreme allusion: I am sure that the planners and developers who made decisions to construct Pruitt-Igoe, Cabrini Green, Hanover Houses were not intending to build bad housing or to offer poor families lives in communities destined to fail. Indeed, the powers that built these very District houses for the poor probably had the best of intentions. Perhaps they even overreached, trying to do too much for too many, producing a project that could not succeed over time. Perhaps we are as capable of making wrong decisions as they.

Density: C100 has real concerns about the density of this proposal. Play spaces are not here, nor are places for family social life. It is not clear that the garages will house today's SUVs nor the street parking accommodate the guests and service workers that are part of a working community. The percentage of impervious surface seems high, raising both environmental and social concerns.

Would a 10% reduction in the number of units produce a subsidized community that would work, where children had better chances to develop into healthy teens and productive adults, where single parents felt respected, where recreation spaces and visitor parking were equally available for them and their friends?

Height: We also believe the height of proposed buildings needs to be reduced overall. The extra height east of the Canal Blocks further isolates the residents, rather than offering a step-down from the commercial properties to the west. Adding the height along M Street continues the isolation, the hemming in of the intensely developed residential blocks.

We ask the Commission to approve only carefully considered intensities, paying particular heed to the commingling of tall commercial buildings with community and residential uses. We are not at all sure that what has been presented constitutes a viable mixed-use community.

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Commercial: The continuing commercial intensity along M Street intensity will mark this new "neighborhood." Where is the standard written into the AWI, calling for a mix on M Street that includes residential properties? Coupled with the intense office-only character of the proposed DOT headquarters, its security setbacks, and its absence of foot-traffic commerce, we urge that you use your most skeptical lens to evaluate these connected developments. Even the proposed ground-level commercial will not likely be neighborhood-serving. K Street shows how such commercial space in office buildings becomes restaurants and cocktail bars, interspersed with the occasional print shop or office supply store. Your order can include some further definitions or restrictions that may mitigate this trend.

We also believe, as the OP report suggests, that the formula analyzing how much commercial space is required to meet revenue needs to subsidize supported housing needs very close scrutiny. In need of even greater attention is the $29 million in social service benefits, constituting 3/4 of the benefits this PUD is said to deliver. We would welcome the opportunity to evaluate this further, inasmuch as it appears to be not new dollars, but primarily a linkage to otherwise-available, tax-supported social services.

Open Space: Similarly, we are concerned about the way in which open space is distributed throughout the project. It appears decisions were made because of the mechanical limitations of certain parcels, rather than allocation where needs were apparent. The Canal Block sites are open because their character precludes most other options. They may fulfill open space requirements, but they offer residents little amenity. Reallocation of open space - or higher requirements - seem essential for this project to work.

Marine Barracks: The assurances referred to by OP about access to the "shared' facilities with the Marines mean precious little in achieving consistent access to recreational space that is *critical* to the quality of life in this project. I accept fully the DOD intention to make this partnership work, but those who offer such assurances are not in control of their destinies. Residents of these houses must have something more reliable, from a pay-grade capable of delivering. The experience of a nearby public charter school is instructive; their agreement with the Marines produces last-minute cancellations of football games and recreation times. Without this facility, this project should not be approved.

Van Ness School: Perhaps nothing more concerns us than the position of the Van Ness Elementary School. Here we challenge both the Commission and the OP (which has also expressed concerns) to do better by the design of the PUD. This small, undermaintained school is an island in the PUD. It presents problems affecting the contiguity of PUD (and we discourage the ZC from making PUD rules still more flexible) because the developer has chosen not to include the site in the

PUD. Moreover, the developer has edged the school for little kids with high-rise buildings, not a fortuitous mix. With this parcel out of the PUD, the developer can turn its back on the needs of the school, even while increasing the number of children who will knock on its door, even while understanding that - given the limitations of the school - those children will be ill-served.

It is not the C100's role to meddle in the elements of public-private development, but we do advocate that the Zoning Commission refuse to use their public power to exceed zoning requirements while it isolates essential public facilities even as it agrees to increase the population in need of those services.

An excellent public school (Brent Elementary) is available very near to this site. Surely a better outcome can be devised, and we encourage the Commission to insist that one be found, one that adds benefits to the site and provides resources for the essential public services that the children of this community will need. For the developer's benefit, it would also eliminate the contiguity problem.

Planning by Zoning: Which leads to our last - and most wide-reaching - comment. We are deeply concerned about the overall impact of a series of rulemaking cases and PUD improvements. Plans that previously would have clearly required an amendment to the comprehensive plan are now being handled as a series of parts. Developments that would have required submission to the Council as plan amendments are now being approved *seriatum* as zoning cases. With all the respect in the world for the Commission, your rules preclude your making decisions on the broad basis that the more political (read that "democratic") process affords. Your decisions must fit within rules and boundaries; you offer citizens a less public forum, however dedicated some of us are to appearing before you.

We would welcome engaging in a dialog with you, the Office of Planning, and the DC Council about how the public can be more involved in the decisions you are being asked to make.

Thank you.

Additional Key Concerns

Removal and Return. There is concern that so few residents will be returned. We find the Urban Institute's bromide that everyone who leaves will be better off – somewhat, somewhere – to be little comfort for those who are being uprooted.

First Source. We hope the Commission would want to see the experience of the developers with First Source contracts and with LSDBE programs. Nothing was offered to document the ability to deliver on the promise.

Design. The intention to use roof and rear decks to deliver recreation space must be reconsidered. Design review board are allowing almost no such facilities in urban areas because of the loss of privacy and the likelihood of disturbance of neighbors. A narrow rear deck over a hard surface is no place for children to play or friends to share a barbecue.

And there must be a more creative approach to providing two-car parking for the most expensive units, rather than the out-of-proportion flat modern lift doors currently reflected in the drawings - doors that offer jarring incompatibilities with the vertical lines of the townhouses. There have to be better solutions in the age of New Urbanism, solutions that deliver a better pedestrian experience on the inner walkways / driveways.

Street Grid. As this project is analyzed, we would strongly endorse OP's concerns about the impact on the L'Enfant street grid and strongly urge the Commission to protect its integrity.

Design Process. Several of our members participated in the May 2000 charette for this area, sponsored by DOH, HUD, OP. Widely considered a successful (if long) community / government planning effort, it was nonetheless viewed as a lost experience as the plans for the greater southeast progressed and was incorporated in the AWI initiative. We regret this, and encourage OP to return to some effective form of this outreach effort – and acceptance of community input.