

# LANGLEY REALTY PARTNERS

June 21, 2005

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Ms. Carol Mitten  
Chair, Zoning Commission  
Office of Zoning  
441 4<sup>th</sup> Street, NW  
Suite 210 South  
Washington, DC 20001

Re Z C Case No. 05-02; Residential Recreation Space (RRS) Text  
Amendment

Dear Ms. Mitten and Members of the Commission:

My firm is planning to construct a residential building located on a parcel zoned C2A located on Wisconsin Avenue. Although it is my intention to construct this building "as a matter of right", it has been particularly challenging to meet the District's RRS requirements and maintain the financial feasibility of the project.

The RRS requirements seem to directly conflict with the density allowed in the C2A zone. In fact, I am finding it very difficult to provide RRS equal to 20% of the building's floor area as required by the Zoning Regulations and, at the same time, maximize the density allowed under the same regulations. In short, I am working with a 16,000 SF site and an allowable FAR of 2.5, so the building could have a total floor area of 40,000 SF. Assuming an average unit size of 1,200 SF, the project would contain about 33 units *without the RRS requirement*. Assuming an RRS of 20%, with half of the requirement being fulfilled inside the building, the resulting loss of floor area would be 4,000 SF or approximately 3-4 units.

As you can imagine, the financial impact to the project of losing 3-4 units is significant while the benefit of the RRS is highly questionable. The fact that so much RRS will have to be provided for such a small project is outrageous, particularly given the project's urban location. 4,000 SF is enough interior recreational space for a 200 unit suburban garden apartment project. Yet, it is my understanding that a developer building the same project on a residentially-zoned land right across the street would not be required to provide *any* RRS.

In order to put my project on an equal footing, I would have to obtain a variance from the BZA, which could take 7 to 9 months and cost a significant amount in legal and consulting fees, not to mention additional carrying costs. This is unfortunate given my understanding that the BZA routinely approves such variances.

05-02-10  
Office of Zoning  
District of Columbia

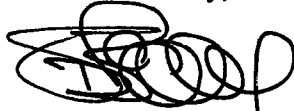
**Ms. Carol Mitten**

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I urge you to eliminate the RRS requirements in their entirety from the Zoning Regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D McCleaf", with a long, sweeping flourish extending from the end.

Steven D McCleaf  
Principal