

Reed-Cooke Neighborhood Association

- P.O. Box 21700,
- Washington DC 20009
- rcna@reedcooke.org

THE ZONING REGULATIONS REVIEW (ZRR)

ZONING COMMISSION CASE No. 08-06A

FRIDAY SEPTEMBER 25, 2015

COMMENTS FROM THE REED-COOKE NEIGHBORHOOD ASSOCIATION

Reference: Subtitle K: Chapter 7: Reed-Cooke (RC)

- Subtitle K is devoted to “special purpose zones”. One Comprehensive Plan element speaks specifically and very positively about the purpose of the Reed Cooke overlay. “**Policy MC-2.4.5: Reed-Cooke Area** Protect existing housing within the Reed Cooke neighborhood, maintaining heights and densities at appropriate levels and encouraging small-scale business development that does not adversely affect the residential community.” Therefore, the Reed Cooke Neighborhood Association would like to see the title of the proposed Subtitle K in reference to the Reed Cooke Overlay with the following title “Reed-Cooke Overlay District”, as it was named in 2014. The term Overlay should be preserved and not replaced by the term Zone. Overlays make sense and are necessary;
- RCNA noticed that in the proposed Subtitle K, §1400.1 from 1400 General Provisions (The Reed-Cooke (RC) Overlay District shall be applied to the portions of Squares 150, 2557, 2558, 2560, 2562, 2563, 2566, 2567 and 2572 in the Reed-Cooke Special Treatment Area, as defined in the Comprehensive Plan, 10 DCMR §1127, that are zoned non-residentially as of January 1991) has been removed and located in Subtitle W. RCNA is asking the Zoning Commission and the Office of Planning to reinsert that provision §1400.1 in Chapter 7 Reed-Cooke in 700 Purpose and Intent (RC) as a sub-title 700.1;
- RCNA has noticed that the updated ZC proposed action Dec 2014 Subtitle K for the Reed Cooke Overlay is showing some major boost in development mostly for commercial instead of residential. We have noticed some contradictions in the text such as Accessory building is moving towards greater density when the Overlay is very strict about small and medium density;
- The increase of FAR for commercial is not acceptable.

- RCNA is asking the ZC to include the two maps with the lots number in Subtitle K. See the two attachments. The geographic description is non-existent in the new regulation compare to the current one;
- RCNA is wondering if there is a desire to eliminate the overlay and encloses the Reed Cooke neighborhood as a whole in one neighborhood when the RCO is currently regulated and protected against massive and commercial development. OP has not contacted the Reed-Cooke Neighborhood Association to discuss and clarify the new proposal and if the new text satisfies RCNA;
- RCNA is reinstating and supporting ANC and KCA resolutions on Subtitle E, F, G, K, Height and setback of roof of row/house structures
- RCNA is reinstating and supporting ANC and KCA resolutions against corner stores as it in all Adams Morgan regulations;
- Paragraph 711: does not allow corner store usage in a RA zone. Subtitle F governs Adams Morgan and Subtitle U authorizes corner stores usage being in contradiction with the other subtitles;
- RCNA is joining ANC and KCA to object to the new requirement lot occupancy;
- 703.1: should not be allowed to be pushed to 100%;
- 710.1: "The provisions of X Chapter 3 of this title shall not operate to permit a planned unit development in the RC zones to exceed the floor area ratio and height standards of K §§ 701 and 702". RCNA believes this provision should be deleted and replaced with 1402.2 of the current Reed-Cooke Overlay "For the purpose of this chapter, no Planned Unit Development shall exceed the matter-of-right height, bulk, and area requirements of the underlying district";
- RCNA objects to the immediately previous draft limited to the increase in nonresidential FAR for lots of 10,000sf or less to the first and second floors; the current draft retains that provision, but adds a requirement, only for the two Reed-Cooke mixed use zones, that the "use shall not include eating or drinking uses";
- RCNA is concerned about the faith of Inclusionary Zoning in the city, especially downtown where OP is planning on tripling the size into exclusive housing and office space, if ZRR is enacted as is. That policy goes against the Comprehensive Plan. IZ is an important part of the zoning regulations for moderate or low income affordability and in the Reed Cooke Overlay;
- RCNA found out two versions of subtitle K that have created quite a bit of confusion.

Enclosed please find the comments on these versions below in a table:

- First of all, both of these versions have the same footnote ZC proposed Action, Subtitle K and carried the same date Dec. 2014;
- Second: the main title in Version 2 includes **CHAPTER 7 REED-COOKE (R-5-B/RC, C-2-A/RC, C-2-B/RC)** when Version 1 does not have any of those references.

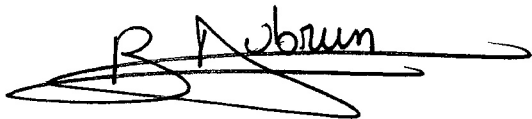
Version 2	Version 1
CHAPTER 7 REED-COOKE (R-5-B/RC, C-2-A/RC, C-2-B/RC)	CHAPTER 7 REED-COOKE (RC)
700 Purpose and Intent	700 Purpose and Intent (RC)
700.1 The RC-1 [R-5-B/RC] 700.2 The RC-2 [C-2-A/RC] 700.3 The RC-3 [C-2-B/RC]	700.1 The Reed-Cooke (RC) zones consist of the RC-1 through RC-3 zones 700.2 The RC-1 Zone 700.3 The RC-2 Zone 700.4 The RC-3 Zone
700.7 The estimates provided for by § 600.6 shall be prepared and submitted according to 700.7 to a standard procedure and format established by the zoning Administrator	700.8 The estimates provided for by Subtitle K §700.7 shall be prepared and submitted according to a standard procedure and format established by the Zoning Administrator
701. Density	701. Density (RC)
701.2 In the RC-2 and RC-3 (C-2-A/RC and C-2-B/RC) zones	701.2 In the RC-2 and RC-3 zones
702. Height and Roof Structure Regulations	702. Height and Roof Structure Regulations (RC)
702.1 NO TITLE for table	702.1 TABLE K §701.1: Maximum Permitted Density
Table: Zone: RC-1 (R-5B/RC) RC-2 (C-2-A/RC) RC-3 (C-2-B/RC)	Table: Zone: RC-1 RC-2 RC-3
703. Lot Occupancy	703. Lot Occupancy (RC)
Table: Zone: RC-1 (R-5B/RC) RC-2 (C-2-A/RC) RC-3 (C-2-B/RC)	Table: Zone: RC-1 RC-2 RC-3
704. Rear Setback	704. Rear Setback (RC)
Table: Zone: RC-1 (R-5B/RC) RC-2 (C-2-A/RC) RC-3 (C-2-B/RC)	Table: Zone: RC-1 RC-2 RC-3

704.1 NO TITLE Please refer to the table for presentation of the numbers for dimensions	704.1 TABLE K §704.1: Minimum rear setback Please refer to table for presentation of the numbers for dimensions
704.2 In the RC-2 and RC-3 (C-2-A/RC and C-2-B/RC) zones	704.2 In the RC-2 and RC-3 zones
705 Side Setback	705 Side Setback (RC)
705.1 NO TITLE for table	705.1 TABLE K §705.1: Minimum side setback
Table: Zone: RC-1 (R-5B/RC) RC-2 (C-2-A/RC) RC-3 (C-2-B/RC)	Table: Zone: RC-1 RC-2 RC-3
Distance: RC-1 (R-5-B/RC) four feet (4ft) RC-2 (C2-A/RC): two inches (2in.) and five feet (5ft) RC-3 (C-2-B/RC): two inches and one inch (1in.) and five feet (5ft)	Distance: RC-1: 4ft RC-2: 2in. and 5ft RC-3: 2 in. and 1ft. and 5ft.
705.2 In the RC-2 and RC-3 (C-2-A/RC and C-2-B/RC) zones	705.2 In the RC-2 and RC-3 zones
706 Courtyards	706 Courtyards (RC)
706.1 NO TITLE for table	705.1 TABLE K §706.1: Minimum courtyard dimensions
Table: Four inches per foot (4in./foot) of height of courtyard Ten feet minimum (10ft. minimum) Etc.. please refer to the table	4in./foot of height of courtyard 10 ft. minimum Etc... Please refer to the table
707 Green Area Ratio	707 Green Area Ratio (RC)
707.1 NO TITLE for table	707.1 TABLE K §707.1: Minimum green area ratio
Table: Zone: RC-1 (R-5B/RC) RC-2 (C-2-A/RC) RC-3 (C-2-B/RC)	Table: Zone: RC-1 RC-2 RC-3
708 Accessory building regulations	708 Accessory building regulations (RC)
708.1 in the RC-1 (R-5-B/RC)	708.1 in the RC-1
709 Alley Lot Regulations	709 Alley Lot Regulations (RC)
709.1 in the RC-1 (R-5-B/RC)	709.1 in the RC-1
709.2 RC-2 and RC-3 (C-2-A/RC and C-2-B/RC)	709.2 RC-2 and RC-3
710 Planned Unit Developments	710 Planned Unit Developments (RC)
711 PUBLIC EDUCATION BUILDING AND STRUCTURES, PUBLIC RECREATION AND COMMUNITY CENTERS AND PUBLIC LIBRARIES	711 PUBLIC EDUCATION BUILDING AND STRUCTURES, PUBLIC RECREATION AND COMMUNITY CENTERS AND PUBLIC LIBRARIES (RC)
712 MATTER OF RIGHT USES (RC	712 MATTER OF RIGHT USES (RC)

ZONES)	
712.1 In the RC-1 (R-5-B/RC)	712.1 In the RC-1
712.2 In the RC-2 (C-2-A/RC)	712.2 In the RC-2 (C-2-A/RC)
712.3 In the RC-3 (C2-B/RC)	712.3 In the RC-3 (C2-B/RC)
713 Uses permitted by special exception	713 Uses permitted by special exception (RC)
713.1 In the RC-1 (R-5-B/RC) zone under subtitle Y	713.1 In the RC-1 zone Under subtitle X
713.2 In the RC-2 (C-2-A/RC) zone under subtitle Y	713.2 In the RC-2 zone under subtitle X
713.3 In the RC-3 (C-2-B/RC) zone under subtitle Y	713.3 In the RC-3 zone under subtitle X
713.5 under subtitle Y	713.5 under subtitle X
714. CONDITIONS ON USES IN FORMER PUBLIC SCHOOLS	714. CONDITIONS ON USES IN FORMER PUBLIC SCHOOLS (RC)
715 USES NOT PERMITTED IN REED-COOKE ZONES	715 USES NOT PERMITTED IN REED-COOKE ZONES (RC)
715.1,2,3 until 715.26	715.1 (a), (b), (c) until (y)
715.1.16 Hotel and Inn	715.1 (o) Hotel
716. RELIEF FROM DEVELOPMENT STANDARDS	716. RELIEF FROM DEVELOPMENT STANDARDS (RC)
716 under Subtitle Y	716 under Subtitle X
716 (b) Vehicular access and egress	716 (b) Vehicular ingress and egress
716 (f) If located within a RC-3 (C-2-B/RC) zone	716 (f) If located within a RC-3 zone

RCNA is emphasizing that the Reed-Cooke Overlay is to maintain densities at appropriate levels to encourage small-scale business development that will not adversely affect the residential community. We clearly have a solid established residential area and the overlay continues to work well for us.

Thank you for your time and consideration.



Bénédicte Aubrun
Reed-Cooke Neighbor Association
At-Large and ABC Liaison

Peter Lyden
Reed-Cooke Neighbor Association
Treasurer