

Advisory Neighborhood Commission 7B

District of Columbia Government
3200 S Street, S.E.
Washington, D.C. 20020
Email: anc7b@pressroom.com
Web: www.anc7b.net
Phone: (202) 584-3400 fax: (202) 584-3420

RECEIVED
D.C. OFFICE OF ZONING
2015 OCT -9 AM 10:18

October 7, 2015

Anthony Hood, Chairman
District of Columbia Zoning Commission
441 4th Street, N.W.
Suite 200 South
Washington, DC 20001

Dear Commissioner Hood:

On October 6, 2015, at ANC's 7Bs regularly scheduled executive meeting, we decided unanimously to submit our resolution, irrespective of the conversation I had on September 29, 2015 with Ms. Sharon Schellin.

I have attached ANC 7B's Resolution. I spoke with Ms. Schellin on September 29, 2015 about submitting our resolution and about the circumstances for it not being submitted by the 25th. I am submitting it along with a request to have it admitted in the record for the ZRR (Zoning Regulations Review).

Further ANC 7B ask for the exact same consideration being given to fellow ANC's who are asking for an extension and for additional documents when submitting their Resolutions so that our attached resolution can be made a part of the final ZC's decisions. On September 30, 2015 it was brought to my attention that possibly ANC 7B was not being given the exact same considerations to be able to submit our Resolution post September 25, 2015 as is being given to three (3) other ANC's.

Additionally, we are requesting the following documents and communications be afforded to ANC 7B with adequate time for review of these documents:

- ✓ A map depicting zoning changes to identify our neighbors that would be impacted by the proposed changes in the regulations and that will be consistent to the Comprehensive Plan for our community.
- ✓ Easier readable chapters with highlights that show the existing regulations when compared to the proposed regulations.

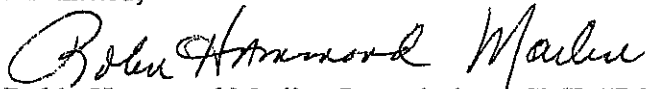
ZONING COMMISSION
District of Columbia
CASE NO.08-06A
EXHIBIT NO.1095

- ✓ Outreach conducted by OP and the ZC to assist the ANC's in clear and understandable changes in the proposed ZRR.

We are concerned that both offices , the OP and the ZC, would not conduct the necessary outreach during this year to properly inform, explain, and discuss with all Advisory Neighborhood Commissions these new proposals. There is no evidence of such outreach being afforded to us since last years February 2014 hearings held by the ZC staff along with the OP staff for the ANC Commissioner's and for the citizens of the District of Columbia. It is not sufficient to only mail out a one (1) page flyer --as a reminder--this year to ANC Commissioner's with no follow-up or companion documents. It would have been welcomed if the ZC and the OP staff had outreached by attending both our civic community meetings or attended our ANC community monthly meetings over the past 1 ½ years since the hearings were held last February in 2014. No invitation from 7b to attend these monthly meetings was necessary and would have been welcomed.

Please contact our ANC office at 202 584-3400 is you have additional concerns and questions. Our email is ANC7B@earthlink.net.

Submitted,



Robin Hammond Marlin, Commissioner SMD 7B05
Chair of ANC 7B

Attachments: **ANC 7B Resolution A. Re: Zoning Regulations Review ZC 08-96; and**
 ANC 7B Resolution B. Re: Zoning Regulations Review ZC 08-96

NAYLOR DUPONT

Advisory Neighborhood Commission 7B

District of Columbia Government

3200 S Street, S.E.

Washington, D.C. 20020
email: anc7b@pressroom.com

web: www.anc7b.net

phone: (202) 584-3400 fax: (202) 584-3420

Advisory Neighborhood Commission 7B Resolution A re Zoning Regulations Review ZC 08-06

Whereas,

Advisory Neighborhood Commission (ANC) 7B has reviewed and discussed the revised District of Columbia Zoning Code produced by the Zoning Regulations Review (ZRR) initiative undertaken by the Zoning Commission and the Office of Planning;

A comprehensive understanding of the changes and their impact on ANC 7B is impossible without additional information, including a red-lined version of the draft under review;

Be it therefore resolved:

ANC-7B supports the DC Comprehensive Plan's guidance on transparent decision-making and requests that all neighborhoods citywide receive the ANC-specific Development Standards Comparison Matrix (showing the heights, densities, lot occupancies, and required yard distances) of the current zoning districts versus the proposed districts in any given ANC district. We understand that not all neighborhoods have received such a "targeted" matrix. In the interest of fairness and transparency, and to clearly explain the ZRR to everyone, we ask that all neighborhoods receive a targeted matrix.

ANC-7B asks for a redline document showing how the language of the draft ZRR reviewed and voted on by the Zoning Commission in December 2014 may have changed with that of the language published in the DC Register in May 2015. This is standard protocol for rulemaking proceedings.

ANC-7B requests that OP and the ZC make the current and proposed zoning maps available to all neighborhood civic groups and ANC's for a side-by-side comparison to assure that new zone districts are mapped correctly as found in the inter-related Zoning Case No. 08-06C (Map Amendment to Implement the Comprehensive Revisions to the Zoning Regulations, including New Zone Names).

ANC-7B supports the call for more time to review the final language of the ZRR in light of the redline and maps. This is reasonable in light of fact that the ZRR implements fundamental policy changes that will permanently affected the scale, scope and look of the city. While the ZRR process has been ongoing since 2007, the actual language was voted on less than a year ago.

This resolution was adopted after discussion by a **vote of 5-0** (with 2 of 7 Commissioners absent) at a regularly scheduled and duly noticed meeting of ANC 7B held on **September 17, 2015 at which a quorum was present.**

Signed,


Robin Marlin, Chair ANC 7B

NAYLOR DUPONT

Advisory Neighborhood Commission 7B

District of Columbia Government
3200 S Street, S.E.
Washington, D.C. 20020
email: anc7b@pressroom.com
web: www.anc7b.net
phone: (202) 584-3400 fax: (202) 584-3420

Advisory Neighborhood Commission 7B

Resolution B re Zoning Regulations Review

ZC 08-06

Whereas,

Advisory Neighborhood Commission (ANC) 7B has reviewed and discussed the revised District of Columbia Zoning Code produced by the Zoning Regulations Review (ZRR) initiative undertaken by the Zoning Commission and the Office of Planning and reached certain conclusions;

Be it resolved, that ANC 7B hereby submits the following comments to the Zoning Commission for its consideration:

Designation of TOD routes for reduced parking requirements. The ZRR uniformly reduces parking requirements by 50 percent for all property within one-half mile of all Metro stations and one-fourth mile along major bus routes (and any future streetcar routes) unless the property lies within an R or RF zone. See Subtitle C, section 702. This is inconsistent with the Comprehensive Plan, which requires neighborhood specific analysis before transit-oriented development (TOD) standards are applied. The Comp Plan states at LU 306.8:

The "reach" of transit-oriented development around any given station or along a high volume transit corridor should vary depending on neighborhood context. While ¼ to ½ mile is generally used across the country to define the walkable radius around each station, and therefore the area in which higher densities may accommodate growth without increased traffic congestion, applying a uniform radius is not appropriate in the District. The established character and scale of the neighborhood surrounding the station should be considered, as should factors such as topography, demographics, and the station's capacity to support new transit

riders. Many stations abut historic or stable low density neighborhoods. Similarly, many of the city's priority transit corridors transition to single family homes or row houses just one-half block or less off the street itself. LU 306.8.

ANC 7B is home to a major bus corridor, Pennsylvania Avenue, which abuts stable low density neighborhoods, low-density commercial nodes and is characterized by hilly topography rising to the eastern rim of the topographic bowl. Section 702 presumptively halves parking requirements for our commercially zoned retail nodes, where parking already is tight. The topography reduces workability, especially for seniors. **We oppose Section 702 in general because of its lack of case by case treatment. More particularly, we ask that Pennsylvania Avenue from Sousa Bridge to Southern Avenue be exempt for Section 702.**

Height limits: The Comprehensive Plan directed the Zoning Commission to reduce maximum allowable heights from 40 feet to reflect what is currently the predominant height in a neighborhood. Except for Georgetown, the draft rules do not do that. ANC 7B asks that heights on all streets except Pennsylvania Avenue be reduced to 30, which is appropriate, given that most buildings are 1 or 2 stories.

Expanded Downtown/Reduced Parking. The draft rules essentially triple the size of Downtown DC and abolish most downtown parking requirements. The existing downtown, as defined in the Comprehensive Plan, covers 6.8 square miles, approximately 10 percent of the city's overall area. Downtown will encompass the areas from the baseball stadium – along the river – 23d Street NW – up to Dupont Circle and east of North Capitol Street. The proposed expanded downtown substantially alters the nature of the District, principally by allowing additional height (about 40 feet), density and intensified uses. There is no basis in the Comp Plan for this overall remaking of the city.

The higher costs associated with downtown locations for shopping, arts venues, dining, etc. will make more of the city financially inaccessible for many residents and small/local businesses. The proposals abolishing parking requirements except for retail make much of the city physically inaccessible as well. **ANC 7B proposes an incremental increase to the existing downtown of no more than 25 percent.**

Citywide, substantially reduced parking requirements will increase competition from apartment residents and commercial patrons for parking in residential neighborhoods adjacent to apartment buildings, schools, transit zones and downtown.

- Developers will not have to provide onsite parking for any use in a broadly defined downtown.
- Within half a mile of Metro stops and quarter of a mile of major bus routes, only 1 space must be provided for every 6 units/families. If more than 2 spaces are provided for every 3 units, developers will be penalized. Currently 1 space is required for every 2 units.

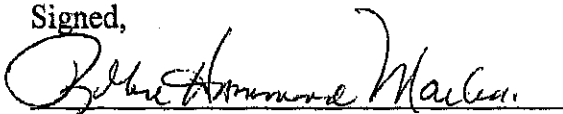
- Single family detached homes will no longer have to have garages or driveways unless they have alley access. Those with garages can convert them for alternative uses while cars move to the street.
- No on-site parking will be required for apartment buildings with 5 or fewer units near transit and in larger apartment buildings the parking requirement is less than one space per six units. Far from transit it is less than one space per three units.

Loss of public comment opportunity. Finally, ANC 7B opposes the dramatic shift away from community-input for projects that currently require special exceptions and variances, in that the ZRR makes many of these projects matter-of right. This reduction in community oversight is not supported by the DC Comprehensive Plan.

In sum, this unprecedented remaking of the city for the young and affluent is without foundation in the Comp Plan and lacks widespread public support. It is not too late for the ZC to turn back and adopt a reasonable set of amended rules that serve the entire city.

This resolution was adopted after discussion by a **vote of 5-0** (with 2 of 7 Commissioners absent) at a regularly scheduled and duly noticed meeting of ANC 7B held on September 17, 2015 at which a quorum was present.

Signed,

A handwritten signature in cursive script, appearing to read "Robin Marlin", written over a horizontal line.

Robin Marlin, Chair ANC 7B