



Summary of Testimony of Nancy J. MacWood
Chair, The Committee of 100 on the Federal City

Zoning Commission Case No. 08-06A, Subtitles E and F

The Committee of 100 **supports** the following proposed concepts.

1. **Creation of two new zones, RF 4 and 5, for row houses currently zoned R5.**
2. **The limitation on conversions to 3 units in RF 4 and 4 units in RF 5.**

The Committee of 100 **does not support** the following proposed text amendments and finds that they are either vague, missing important existing standards, or inconsistent with Comprehensive Plan or intent of current zoning proposals. Suggested changes to each section are in italics.

1. Purpose statement, Subt. E, Sec. 100.3(a) is too all-inclusive and it removes the important purpose statement that R4 zones are partly intended to stabilize remaining single family homes. *The policy statements regarding walkable neighborhoods, housing affordability, aging in place, improvements to the overall environment are land use policies that are self-evident for all zones, but are not mentioned in other residential zones. The existing purpose statement includes protection of single family homes from conversion to multi-family housing and that goal should be in the purpose statement.*

2. The expansion of apartment houses in RF 4 and 5 zones based on 750 sf of lot per unit is not consistent with existing R4 requirement of 900 sf. *The Zoning Commission should carefully consider where these zones will be mapped and what the current density allowance is to determine if this reduction would be compatible with conditions in the neighborhood. Since mapping will not occur before the regulations are approved, a better solution would be to delete Sec. 504.4 and add RF 4 and 5 zones to Chapter 6, which would apply 900 sf of lot per unit as the standard for all RF zones.*

3. Height measurement of accessory structures from finished grade. *Height measurements on same lot should be consistent and in RF zones should be from existing grade.*

4. Corner store provision is unclear. Proposed Sec. 1106 provides for special exception for numerous types of corner stores, but none of these uses are listed as authorized on the RF use tables. *Non-residential uses can destabilize a neighborhood and remove housing from the neighborhood inventory. Moreover one of the main reasons for creating RF 4 and 5 is to protect row house housing by*

down zoning and removing inappropriate density and uses. The Council should amend the Comprehensive Plan to provide policy direction regarding corner stores and RF neighborhoods should request these uses and under what conditions they would support them. The allowance, including special exceptions, should be removed.

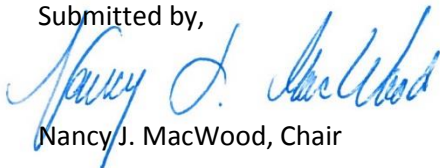
5. Institutional uses and office uses (Sec. 1102.9 and 1102.10) in a residential zone have the potential to alter the quality of the neighborhood. *These uses, if allowed at all, should have concentration limits not by square but by feet. There should not be one per block and two per block may be too much housing converted for non-residential use. The use should be incidental. Again, if the goal is to preserve the residential quality and encourage appropriate residential development in RF zones, these proposals are contrary to that goal.*

6. The purpose statement in Subt. F, Se. 100.3 does not mentioned affordability even though the A zones provide the most housing density. *If affordability is an appropriate purpose of RF zones, it should be an appropriate purpose in A zones.*

7. R5A zones are not exclusively apartment zones. *This zone should be moved from the A zone to the R zone. The R5A development standards and appropriate use authorizations are more aligned with R zone districts.*

8. Eighteen and one-half foot ("18.5 ft.") roof structures are out of scale on row houses and small apartment buildings. *Extend the 10 ft limit proposed for Capitol Hill R5B zones to all existing R5A and R5B zones, at a minimum. All row houses may not be mapped in RF 4 or 5 and they should be protected, as should smaller apartment buildings, from overly large roof structures.*

Submitted by,



Nancy J. MacWood, Chair