



Zoning Commission Hearing, Case No. 08-06A

Subtitles E and F

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Chair, The Committee of 100 on the Federal City

November 7, 2013

The Committee of 100 supports the creation of new zones, RF 4 and 5, in order to downzone and protect rowhouses, currently zoned R5B and higher, from inappropriate development. We also support the permission to allow by right three (3) units in RF 4 and four units (4) in RF 5.

In addition, we have a few suggested changes to Subtitles E and F:

1. The purpose statement for RF zones should include the existing purpose of protecting single family homes from conversion to multi-family housing. The long list of proposed purposes – walkable neighborhoods, housing affordability, aging in place, and improvements to the environment – are reasonable attributes of any District neighborhood. We question why these features are mentioned only in Subt. E. What is unique about residential flat zones, as opposed to apartment zones, for example, that requires mentioning these attributes here?

2. As is the case with other residential zones, height measurement methodology should be consistently measured from the existing grade and not from the finished grade for all measurable structures on a lot.

3. Chapter 6 doesn't authorize the conversion to apartment buildings in RF 4 and 5, which is consistent with the intent to preserve the row house residential character of the zones. Sect. 504.4, which seems to allow conversion to apartment buildings, should be deleted so as to avoid confusion. If it is determined that conversions are appropriate the minimum lot square footage should be increased from 750 sf to 900 sf, which has been the minimum square footage required to create a flat. There seems to be no rational for lowering the standard in the new zones.

4. Permitted non-residential uses should be judiciously determined to avoid unintended consequences just as they are in lower density residential zones. The corner store provisions would introduce a host of new non-residential uses into primarily row house neighborhoods that may not welcome non-residential uses, especially since many row house neighborhoods are already proximate to

retail and service uses. With one hand we are trying to preserve row house living and with the other we are allowing this housing to become partly commercial. We are not aware of policies in the Comprehensive Plan that ask the Zoning Commission to create an allowance for the replacement of housing with corner stores. We urge the Zoning Commission to seek guidance from the Council on this matter or to authorize corner stores based on requests from RF-zoned neighborhoods that they would like corner stores for specified non-residential uses.

5. Permitting office uses in large historic houses might have served a need to find a use for these houses many years ago, but the proliferation of these uses and the complaints from residents that they add nothing to the neighborhood's quality of living, suggest that it is time to remove this allowance. These historic assets could be better utilized as housing. The allowance for institutional uses in any house in the RF zone is also unwarranted, if the goal is to preserve row houses for residential living.

6. Apartment Zones (A) should have Residential added to the title. The areas zoned A will be primarily residential with varied housing and a range of density permissions. These are residential zones and they should be titled RA zones to make it clear that there is no intention to develop these areas as anything but primarily residential

7. We suggest that by right roof structure dimensions should be proportional to the maximum permitted height. Therefore, we urge the Zoning Commission to change proposed Sec. 1001.3 (b) to permit roof structures of ten (10) feet in existing zones R5A, R5B, and R5C. A height of eighteen feet six inches (18 ft 6 in.) is proportional for roof structures in R5D and R5E where heights of ninety (90) feet are permitted.