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To: DC Office of Planning
Re: Written Comment on Proposed Zoning Ordinance, ZRR Case No. 08-06A

October 28, 2013

Thank you for providing an opportunity to comment on the proposed changes to DC's zoning regulations. I am a private resident of the Brookland neighborhood. My wife and I have lived in the District for 5 years. I also serve as the Vice President of the Brookland Neighborhood Civic Association (BNCA), but offer these comments solely in my personal capacity.

My first comment is to write in support of a separate comment submitted by the law firm of Macy Zelson, putting forward a proposal to establish a special exception process for big box retail development. Mr. Nelson spoke at a recent BNCA meeting about the need to include special rules governing big box development in DC and other urban areas, and that DC has a unique opportunity given the current rewrite of the zoning regulations. Unfortunately, the BNCA did not have the time to debate and pass a resolution in support of Mr. Nelson's proposal. However, in speaking with many of our members after the meeting, it was clear to me that I am far from alone among Brookland residents in hoping that any further big box retail in the Brookland area is significantly restricted. These zoning rules provide an opportunity to develop such restrictions. In making this comment, I also invoke the Small Area Plan for Brookland, which calls for boutique retail development along Monroe and 12th Streets, with an emphasis on supporting small, locally owned businesses.

Walmart and other big box retailers regard urban areas as the final frontier in their effort to dominate the American retail market and drive small business competitors out of existence. They have an extremely aggressive strategy for invading the District, with the intent of eliminating small business competition, and pay wages at a rate so inadequate to living standards in DC that government subsidies are guaranteed to be required. Big box retail also has the tendency to create urban blight, large parking lots and impermeable surfaces inconsistent with historic area protections and environmental regulations. They are a key barrier to smart growth goals to create green space, reduce auto traffic, and properly manage stormwater. Numerous studies detailed in Mr. Nelson's comments document the deleterious effect of big box retail on social conditions, the environment, economic opportunity, and protection of attractive, historic urban spaces.

If the DC government fails to include special rules regarding big box development in the new zoning ordinance, based on the decades of experience local governments now have in dealing with these monstrosities, it will have missed one of the best opportunities in years to make significant progress in the regulation and control of big box retail. The people of DC are looking for a balanced approach to development. Special zoning rules to address the unique challenges of big box development must be a part of that effort. So, I personally strongly endorse Mr. Nelson's proposal.

The second comment I would like to make is in support of the rules allowing residential agriculture. Given the recent surge in interest in urban gardening and small scale urban ag in recent years, and particularly the new information documenting the social and environmental benefits (environmental education, food education, community growth and connection, sustainable local food sourcing, etc.), the Zoning rewrite correctly provides authorization for some limited agricultural production on residential properties in the District.

I would make one suggestion, however. In the definition of “Agriculture, Residential” under section 201.2, I recommend including the term “raising poultry.” This is not included in the examples mentioned. Poultry is included in the definition of “Agriculture, Large,” in 201.1, and the rules for residential property agricultural uses appear to be similar. But it should be clear that raising a small number of, e.g., chickens, for personal use, is a form of residential agriculture, rather than “large” agriculture.

Thank you for the opportunity to comment.

/s/ Dan Schramm