



September 12, 2014

Anthony J. Hood, Chairman
Zoning Commission for the District of Columbia
441 4th Street NW
Suite 210 South
Washington, DC 20001

Re: GSA Comments to the Case Number (ZC Case No. 08-06A) Title 11, Zoning Regulations – Comprehensive Text Revisions; Hearing Report on Subtitle I – Downtown (D Zones) dated November 4, 2013

Dear Mr. Hood:

The U.S. General Services Administration (GSA) commends the District of Columbia in its vision to make monumental updates to the city's zoning regulations. The comments provided in this letter refer specifically to the most recent revisions of the D-8-B-1 zoning precinct proposed for south of Independence Avenue SW.

GSA is currently evaluating a unique opportunity to provide new housing solutions for some of our tenant agencies by leveraging the value of currently underutilized property in the area of the city south of Independence Avenue, commonly referred to as Federal Triangle South. Through this initiative, GSA will consider transferring title of some property from the Federal Government to the private sector. As such, the proposed D-8-B-1 zoning precinct is an important consideration to this initiative, while also a critical opportunity for the City to realize its vision for the area.

GSA respects and appreciates the shared vision articulated in the DCOP Maryland Avenue Small Area Plan, and the NCPC/CFA SW Ecodistrict Plan to transform the federally dominated precinct south of Independence Avenue into a vibrant, mixed-use, sustainable neighborhood. We also respect the concept embodied in the zoning designation to provide additional non-commercial development capacity in exchange for the re-dedication of ROW for public streets.

If crafted properly, the proposed D-8-B-1 zoning designation could incentivize mixed-use development; improve pedestrian and transportation connections; promote quality urban

U.S. General Services Administration
1800 F Street, NW
Washington, DC 20405-0002

www.gsa.gov

ZONING COMMISSION
District of Columbia
CASE NO.08-06A
EXHIBIT NO.832

design; and encourage higher density and more sustainable development. However, GSA is concerned that this zoning designation, as currently drafted, will not achieve these goals because the development capacity of the identified Street ROW actually exceeds the incremental development capacity made available as an incentive. Instead of encouraging the type of development envisioned in the Small Area Plan and the SW Ecodistrict Plan by increasing development capacity, the proposed language reduces development capacity and jeopardizes the potential opportunity for re-development of any kind.

In order to achieve the type of development envisioned for this area, we encourage the city to re-consider and refine the street network needed to serve this precinct. The Street ROW suggested in the draft zoning language generally exceeds the ROW needed for transportation purposes, and the current configuration of the 12th Street ramp severely impacts development opportunities between 11th and 12th streets. With a refined vision of what this zoning is intended to achieve, along with a modified street network, a revised D-8-B-1 zoning designation can contribute to the potential redevelopment and transformation of this important precinct. We remain hopeful that we can work together to identify a proposed street network to support this area, and refined zoning language that reflects our mutual goals.

In addition, to more clearly defining the ROW needed to support the transportation network for this precinct, we suggest that the language for A. Historic Preservation Considerations, be clarified by excluding D-8-B-1 from the provisions in Section 308.3 and add that within the D-8-B-1 zone, the provisions of § 308.3 shall apply only to the portion of the property within the footprint of a historic landmark and contributing building in a historic district.

Thank you for the opportunity to comment. We look forward to discussing these comments and continuing to work with you in the coming months to achieve a successful outcome. If you have any additional questions please feel free to contact me at 202-365-7936.

Sincerely,



Bill Dowd
Project Executive

cc: Ellen McCarthy, Director, DC Office of Planning