

Zoning Commission of the District of Columbia

Case No. 08-06A

**Submission of John Lawrence Hargrove
and Ann Hughes Hargrove**

on

Subtitle G

September 12, 2014

Adams Morgan's commercial strips are zoned for mixed residential and non-residential use – C2-A and C2-B, which prescribe a stated limit on the floor area that can be devoted to commercial or non-residential use. For C2-A the total allowable FAR is 2.5, of which the maximum permitted non-residential FAR is 1.5. For C2-B the figures are 3.5 and 1.5.

In Subtitle G of the proposed regulations as amended by OP's Alternate Text proposed on June 16, 2014, C2-A and C2-B become MU-4 and MU-5 respectively. The special Reed-Cooke mixed use zones, C2-A/RC and C2-B/RC were to become M-33 and M-34 respectively, although OP has now proposed that the Reed-Cooke overlay be incorporated into Subtitle K and those zones renamed RC-2 and RC-3 respectively. It appears that Subtitle G by and large continues the existing development standards and use permissions in these zones, with at least two significant exceptions that would have the effect of downgrading and diminishing the residential component of these mixed use areas:

First, in both zones they do away with the existing 60% maximum lot occupancy limitation, a principal function of which is to ensure light and air to residential apartments located on upper floors. *G-301 and 901*. We see no good reason for this shift, which would mean that a building could occupy the entire lot except for a narrow setback at the rear.

Second, the new regulations would give an automatic increase of permitted non-residential FAR, from 1.5 to 2, based on lot size of 10,000 square feet or less, to the great majority of mixed-use buildings in Adams Morgan. *G-303.2 and 903.2*. This again is a gratuitous creep toward straight commercialization of our mixed-use areas, which we believe is unwarranted and harmful to Adams Morgan's special diverse character.

We oppose these changes, and urge that they be stricken.

It is important to note that the present configuration of these zones differs from the mixed use zones as adopted in 1958 and later amended, which were tilted in the direction of demolition and straight commercialization. (Planners circulated concept plans for redevelopment and replacement of original row houses by sleek high-rises.) The present configuration of these zones is a result of three citizen-initiated cases case before this Commission, emanating from Adams Morgan, that lowered the C-2-B height limit from 90 to 65 feet, eliminated the possibility of straight commercialization of individual buildings (in the “Article 54” case), and replaced the grossly inappropriate industrial zoning that had been imposed on the Reed-Cooke neighborhood. Genuinely mixed-use zoning works in Adams Morgan, it is historically zoning by community choice and not fiat, and we oppose any move tending to dilute its residential component.