

**Statement of Barbara Kahlow on behalf of the WECA  
for ZC's 4/6/15 Hearing on Case No. 08-06C, ZRR Map Amendments**

I, Barbara Kahlow, live at 800 25th Street, N.W. This statement is submitted on behalf of the West End Citizens Association (WECA), the oldest citizens organization in the Foggy Bottom-West End area of Ward 2. The WECA is primarily interested in maintaining and improving the quality of life for the existing residential community in Foggy Bottom-West End.

On March 18, 2015, the WECA asked the Zoning Commission (ZC) for a postponement of its April 6<sup>th</sup> Zoning Regulations Rewrite (ZRR) Map Amendments Hearing (ZC No. 08-06C) until the public has had an opportunity to review and comment on the proposed draft ZRR text which is still not available. On February 9<sup>th</sup>, the ZC set down this case basically without discussion.

Case No. 08-06C, captioned "Map Amendment to Implement the Comprehensive Revisions to the Zoning Regulations, including New Zone Names," includes not only many Map Amendments across several Wards and neighborhoods, including 11 in Foggy Bottom-West End, but also the Office of Planning's (OP) changes in Zone Names which would add enormous and unnecessary complexity to the zoning rules and for the public. First, let me address the latter.

In my March 15, 2015 post-hearing submission for the WECA to the DC City Council Committee of the Whole (COW), I stated:

OP's chart captioned "Zone Name Changes As Approved by Proposed Action" ... reveals the complexity of the whole Zoning Regulations Rewrite (ZRR). As I indicated as an example, the existing mixed use C-2-A zone is replaced by 13 new zones: MU-4, MU-17, MU-24, MU-25, MU-26, MU-27, NC-2, NC-3, NC-4, NC-7, NC-9, NC-14, & NC-16. This is ridiculously unnecessary & confusing.

What is the ZC's rationale for adding this enormous complexity? Wasn't the entire rationale for ZRR to simplify the current and time-tested zoning rules?

As stated in the WECA's March 18, 2015 postponement request letter, "Logically, the Map Amendments hearing should be AFTER (not before) ... the proposed draft text ... we asked OZ for a necessary delay for fairness to the public. ... The rationale for a delay is because ... "the public won't know all of the ramifications of these proposed Map Amendments until we see the proposed ZRR text" and then the ZC will consider these 90 days of public comments before it makes key decisions, e.g., to triple the size of the downtown and to do so without a prior change in law."

As I stated in my March 12, 2015 WECA testimony during the COW's continuation OP performance hearing:

I want to emphasize only one of the major substantive issues – a dramatic expansion of the downtown without any change in the statutory definition by the City Council of the Central Employment Area (CEA). My understanding is the OP is proposing a 3-fold

expansion of the downtown (see attached map). Over the years, the WECA carefully fought to limit the expansion of the CEA into Foggy Bottom-West End. ZRR now includes expansion of the "downtown" into Foggy Bottom-West End (e.g., [East of 22<sup>nd</sup>] Street) and OP seeks to accomplish this enormous change by Map Amendments instead of a change in law. In the February 20, 2015 DC Register, OP had the Office of Zoning Notice an April 6, 2015 Zoning Commission hearing to effectuate these changes now, i.e., in advance of the Zoning Commission's continuing consideration of ZRR with at least one more not yet scheduled public hearing on the policy changes.

There are major impacts for an expansion of the downtown in Foggy Bottom-West End, including (a) increased height (due to an accompanying proposed expansion of Transferrable Development Rights (TDRs) into more of Foggy Bottom-West End), (b) increased allowable density for non-residential uses, and (c) reduced parking requirements.

Specifically, Case No. 08-06C #22 proposes to change protective mixed use SP-2 zoning in Squares 170 (including AIA), 171 (including the Corcoran Gallery of Art), 172, and 173 (including the Red Cross) in Foggy Bottom to the new D-2 zone. The WECA objects to any increase in allowable height and any reduced parking requirements in this part of Foggy Bottom. Case No. 08-06C #24 proposes to change portions of Squares 72 (this Square includes R-5-E residential use), 73 (this Square includes R-5-E residential use & the historic Stevens School), 74 (including the IFC), 76, 78 (including the historic Arts Club), 99 (this Square includes R-5-E residential use), and 100 in the West End from C-3-C zoning to the new D-5 zone. The WECA objects to any increase in allowable height and any reduced parking requirements in this part of the West End.

Thank you for your consideration of the WECA's views on this untimely and unfair hearing.