

D.C. Zoning Commission

**Hearing on Z.C. Case No. 13-14, a First Stage and Consolidated PUD and Map
Amendment for the**

**McMillan Sand Filtration Park submitted by the District of Columbia and Vision
McMillan Partners, LLC**

Testimony of Nancy J. MacWood

Chair, the Committee of 100 on the Federal City

May 13, 2014

The Committee of 100 on the Federal City opposes the Planned Unit Development, Case No. 13-14, for the McMillan Sand Filtration landmark (“PUD”) that has been submitted by the District of Columbia and Vision McMillan Partners (“VMP”). This 25-acre site is a significant DC historic resource and DC public land holding. Both aspects of the property were carefully considered in the 2006 District of Columbia Comprehensive Plan. The proposed PUD does not respect the vision for future use of this property outlined in the Comprehensive Plan by the DC Council. It ignores the historic context of the property by obliterating the landscape and important views and vistas with intense development that also isolates the above ground contributing historic structures. For these reasons, the Committee of 100 urges the Zoning Commission to reject the PUD and Related Map Amendment as proposed.

The Comprehensive Plan is unusually prescriptive in outlining basic objectives for any reuse of McMillan in recognition of the intense pressure to develop a large site, despite its historic significance. The Land Use Element cautions that large sites, like McMillan, should not be developed as self-contained and isolated communities, and instead should utilize existing city street grid patterns and model the scale and massing of adjacent developed areas.¹ The Mid-City Element of the Comprehensive Plan provides specific goals for future use at McMillan.

¹ **Policy LU-1.2.6: New Neighborhoods and the Urban Fabric.** On those large sites that are redeveloped as new neighborhoods (such as Reservation 13), integrate new development into the fabric of the city to the greatest extent feasible. Incorporate extensions of the city street grid, public access and circulation improvements, new public open spaces, and building intensities and massing that complement adjacent developed areas. Such sites should not be developed as self-contained communities, isolated or gated from their surroundings.

Commission identified this site as part of the Emerald Necklace connecting open spaces and providing axial views as established by the L'Enfant Plan. District residents have spent the past year studying the effects of proposed changes to the Height Act with the result that we and our elected representatives on the DC Council strongly reasserted that maintaining vistas and views, which connect residents in neighborhoods throughout the city to the District's monumental core, is a right that we want protected. District residents do not distinguish between federal and local interest when it comes to protecting the iconic planning of our city and we expect our decision makers to respect our wishes. This PUD is an example of excessive economic development that ignores long established District planning principles and that is partly why there is so much resistance to it.

There are visual linkages formed from the Soldiers' Home that connect the National Shrine and Trinity College to LeDroit Park Historic District and the older campus of Howard University. McMillan sits between the existing reciprocal views between the Soldiers' Home and the US Capitol dome, the Old Post Office tower and the Washington Monument. Recognizing its strategic location, NCPC found in 1990 that any development on the sand filtration site should be widely spaced and should not exceed the height of the Veterans Hospital, which is 4 stories by design, in order to preserve vistas. Despite this, the proposal calls for 9 story office buildings opposite the Veterans Hospital and in direct line of the significant view sheds.

Instead of heeding the city's own Comprehensive Plan that this site should predominately be left open and the clear guidance from NCPC about how to protect historic views and vistas from over development, the city administration has set aside only about a ¼ of the site for contiguous parkland. Part of this area includes the south service court roadway and a community center that hardly meets the needs of the community. Where is the basketball court? Why is there a catering kitchen? Is the multi-purpose community room linked to a very large outdoor terrace by a series of French doors really an event venue? One could easily envision valet parking for fancy hospital events given the traffic pattern on the south service court. Is this really what the city thinks is important to address the critical shortage of recreation facilities in this part of the city? And can it be a good sign that the city is considering turning management of the community center and the remaining open space over to private management?

Necessary development should reflect scale and mix of new uses compatible with existing development and neighborhood needs

As mentioned above, every planning document since the McMillan Commission has urged maintaining vistas and open space at this site. But it has also been recognized that some development might be necessary to stabilize the site. The PUD unfortunately has no elements of restraint based on the foremost goal of preserving the majority of the site and making

development incidental and complementary. The developers have taken height cues from the Washington Hospital Center, north of Michigan Avenue, which is not in the central view sheds as the PUD is – which is why the Veterans Hospital would be the relevant height model. In general, it would be more appropriate to take density cues from the surrounding row house neighborhoods, which are zoned R3 or R4 and allow maximum heights of 40 feet with 20 foot rear yard setbacks and maximum 60% lot occupancy.

In addition to housing, the Comprehensive Plan cites retail as an appropriate use on this site. It is worth noting that the typical commercial zone designation adjacent to R3 and R4 neighborhoods citywide is C-2-A. There are blocks of C-1 and C-2-B(in overlay zones) and bits of C-3-A along Georgia Avenue and at Martin Luther King, Jr. Blvd. and Good Hope Rd., but C-2-A with maximum height of 50 feet (65 feet with a PUD) is consistent around the city when row house neighborhoods are adjacent to commercial zones.

The planning for this PUD has followed the vacant land development model where guidelines and objectives can be established by the developers even though the DC Council took pains to make sure that didn't happen with this highly significant site. The developers chose or were instructed to ignore the prescribed very restrained approach that would protect the existing neighborhood fabric and provide desperately needed fields and recreation opportunities and more retail and service options on this unique and historic public property.

Design any development to reduce parking and traffic impacts and improve transportation options to the site and surrounding neighborhood

The PUD proposes big increases in the minimum parking required for most of the proposed uses. More than 1,000 parking spaces over the minimum would be built under the 9-story office buildings. Adding so many cars into an already congested roadway system has been recognized, but the traffic consultants argue that it is not their role to solve congestion or even avoid worsening it, their job is to facilitate the development and if you have medical offices there will obviously be lots of comings and goings. The problem is that the Comprehensive Plan specifically states that development has to lessen traffic impacts and improve transit options. The PUD does neither

There are lots of promises of future public transit improvements, but no guarantees. This is the opposite of transit oriented development. In response to the criticism that its irresponsible to create so much density and intensity of use where there is a deficit of public transit options the developers make a vague commitment to sponsor shuttles based on demand for such. With so much parking how will demand be identified? Will there be shuttles from the surrounding neighborhoods to the recreation center or the park – neither of which will have any

constructed parking spaces - when the 29 on-street parking spaces can't accommodate the intended use of these facilities?

Design any development to complement the surrounding architecture

The architects have said they used the barrel cells as inspiration for the architecture, but it seems they focused on incidental features, like ivy covered walls, rather than the materials and the character of the space. In addition, their architectural treatment doesn't respond to the Comprehensive Plan's directive to use the surrounding neighborhoods for architectural cues. The PUD features ubiquitous metal and glass panels and harsh and boxy massing and shows no inspiration from the Tolkien-esque architecture of the site or the brick row houses with front porches and ample yards featured in Bloomingdale and Stronghold.

Conclusion

While testimony suggests all manner of care was taken to preserve historic above ground structures, provide substantial open space, and avoid creating an isolated, incompatible development, the facts tell a different story. Proposed heights are clearly excessive and will destroy major networks of vistas; the intensity of building mass will obliterate the park setting, the existing planned landscape connecting to the reservoir and the existing network of parks and open space will be permanently interrupted, congestion will be exacerbated; and, the long promised adaption of the sand filtration site as primarily a neighborhood park and recreation area with minimal and low-scale development will be history.

The Committee of 100 has no objection to some development on this site, but it has to be very carefully planned and the major objective cannot be premised on creating as much development and revenue generation as possible. The site offers many benefits to the city that eclipse the revenue potential for a vacant 25 -acres site. The historic and quality of life attributes of the site should be paramount in planning development for McMillan. The PUD fails to do that.

The Committee of 100 urges the Zoning Commission to reject the PUD, as proposed, and to find that the site plan is not consistent with the Comprehensive Plan and that appropriateness, character, scale, mix of uses, and design for the proposed development would detract rather than enhance the site and the public objectives for this very important public land holding and historic site.