



Coalition for Smarter Growth

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January 15, 2015

The Hon. Anthony Hood, Chair
District of Columbia Zoning Commission
441 4th St. NW #200
Washington, D.C. 20001

RE: Opinion on Case No. 14-11 (Office of Planning-Text Amendments to Chapters 1 & 4: Definition of Mezzanine and R-4 Zones)

Dear Chairman Hood:

Please accept these comments on behalf of the Coalition for Smarter Growth (CSG). The Coalition for Smarter Growth is the leading organization working locally in the Washington, D.C. metropolitan region dedicated to making the case for smart growth. Our mission is to promote walkable, inclusive, and transit-oriented communities, and the land use and transportation policies and investments needed to make those communities flourish.

CSG agrees with the intent of the Office of Planning's (OP) proposed amendment to ensure compatibility of new development with existing development in R-4 neighborhoods. However, upon review of the proposal we believe that certain modifications would help to better align the amendment with this intent. Further, in a time when strong demand to live in the city is leading to increased housing prices, we are concerned that this proposal could have the adverse effect of constricting housing supply, and further increasing housing prices. Please find our comments and suggestions below.

Height

We believe that the main concern regarding new development in existing R-4 neighborhoods is not the empirical height measurement, but rather the way building height is perceived due to bulk, massing, and aesthetics. In other words—building bulk, massing and aesthetics contribute to a sense of compatibility or incompatibility to a much greater degree than the empirical height measurement. As such, we are concerned that a by-right height reduction to 35 ft. in the R-4 zone will compromise future opportunities for modest infill, yet fail to address the real and fundamental issues of compatibility.

Consequently, we suggest that the Zoning Commission ask the OP to:

- 1) revise the proposed amendment to maintain the existing by-right height of 40 ft.,
- 2) add basic regulations to the R-4 zone to manage building massing and form (see attachment), and
- 3) consult with stakeholders to create infill design guidelines that support the R-4 regulations and provide clear guidance on interpretation.

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ZONING COMMISSION
District of Columbia

CASE NO. 14-11
ZONING COMMISSION
District of Columbia
EXHIBIT NO. CASE NO. 14-11
EXHIBIT NO. 138

The advantages of this approach are twofold:

- 1) Stakeholders—including communities, property owners, and developers—would have clarity regarding acceptable forms of new buildings/additions. The Administration would have guidance in decision-making on individual development permit applications.
- 2) The fundamental issues of building compatibility would be clearly and comprehensively addressed.

We believe new R-4 regulations regarding form and massing could be quite simple, and we include sample regulations here as an attachment. In regard to infill design guidelines, we note that several North American cities—including Baltimore, Calgary and Portland—have created guidelines that could serve as inspiration for a made-in-DC design solution.

Maintaining the existing by-right height of 40 ft. in the R-4 zone—coupled with regulations and design guidelines that manage massing and aesthetics—will allow for a moderate amount of infill development over time and adequately address issues regarding compatibility.

Conversions of R-4 rowhouses with minimum lot area of 900 square feet per unit to multifamily buildings

We are unconvinced that the proposed prohibitions on conversion of R-4 rowhouses with a minimum lot area of 900 square feet per unit will necessarily make more housing affordable to families in search of 3 and 4 bedroom units. While we would like to see more 3 and 4 bedroom homes available for those who currently find them unaffordable, we think this matter deserves a more systematic assessment of the city's overall housing needs, demographics and incomes. Rather than the drastic step of prohibition of allowing more units in buildings on larger lots in the R-4 zone, we ask Office of Planning to assess how to address affordability concerns for DC households comprehensively.

Thank you for your consideration.

Sincerely,



Cheryl Cort
Policy Director

ATTACHMENT 1**Sample R-4 District Compatibility Regulations****336 DESIGN REQUIREMENTS**

- 336.1 The design requirements of § 336 2 shall apply to any lot in the R-4 District for which a building permit was applied for after July 31, 2015.
- 336.2 The portion of a new or renovated building that exceeds the average height of the two (2) buildings directly adjacent to the subject lot shall be designed to minimize the visual impact of the additional height. This shall be accomplished through a combination of architectural features that may include set backs, roof type, roof pitch, building materials, and variation in façade treatment, consulting design guidelines adopted pursuant to this section.