

Testimony before the Zoning Commission of the District of Columbia
Walter Reed Proposed Rezoning Map and Text Amendments, Case #14-22
April 2, 2015

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Chair Hood and Members of the Board.

Good evening and thank you for the opportunity to speak

A bit of background about us. Faith Wheeler was a member of two Walter Reed community advisory groups: the Walter Reed Local Redevelopment Authority and the Walter Reed Community Advisory Committee. She was also the Advisory Neighborhood Commissioner, representing 4B02, the district across the street from the main campus, for 12 years, ending in 2014.

Sara Green was the Advisory Neighborhood Commissioner, representing 4B01, a district also located across the street from the Walter Reed main campus, for about a dozen years between the early 1980's and 2014.

Walter Reed offers a rare opportunity to bring good design and planning to a large, prime historic site that is surrounded by some of the most attractive and stable residential neighborhoods in the city – Shepherd Park, Takoma, and Brightwood. We need to ensure that what is built will be compatible with its neighbors

The Small Area Plan was endorsed by large segments of the community during 11 public meetings attended by hundreds of residents. It constitutes a commitment by the Office of Planning to the community's concerns and priorities. What the current zoning proposal calls for, in some key issues, is a significant deviation from those commitments.

We also need to ensure that the community is not shut out from participating as the project develops over the next ten or twenty years. Unfortunately, the proposal effectively eliminates community input

There is much to support – the preservation of 90 percent of the mature trees in the “green breather” spaces on Georgia Avenue and of the Great Lawn, making the original hospital the focal point of the entire campus, and providing new retail and housing, for example

This testimony details key elements that are of concern.

ZONING COMMISSION
District of Columbia
CASE NO. 14-22
EXHIBIT NO. 23
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CASE NO.14-22
EXHIBIT NO.23

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Three-Dimensional Model Needed

We support Advisory Neighborhood Commission 4B's (ANC 4B) recommendation, based on testimony from Architect and Urban Planner David L. Hamilton during ANC 4B's February 23, 2015 meeting, that the Zoning Commission delay the conclusion of its public hearing to give the developer and OP time to produce a "three-dimensional model showing topography, height, bulk and massing of the surrounding community.. to solicit effective input from the impacted community."

Mr. Hamilton is a second-generation Takoma resident who recently retired from 30 years at the National Capital Planning Commission where he was the project manager for the Southeast Federal Center Development, a 44-acre project comparable in impact and significance to the 66 57-acre Walter Reed site. He told us that the Planning Commission required a three-dimensional model for the Federal Center and for other projects

In response, the developer noted that the detail in a model would be too small to be meaningful. Mr. Hamilton explained that there are several ways to produce a model, and separate sections could feature heightened detail in the sensitive areas.

Walter Reed is a multi-billion dollar project. It is one of the largest, if not the largest, building sites in the city. We therefore conclude that Walter Reed's size and significance, particularly when 85-foot-tall matter-of-right (MOR) buildings are proposed, combined with need to inform impacted residents, makes the production of models essential, even though there will be a delay in adopting zoning regulations.

Separate Walter Reed Zoning and its Impact -- Not in the Public Interest

The Commission should reconsider creating special zoning regulations for Walter Reed, or for any other site in the city

We have just concluded an arduous and years-long citywide zoning rewrite process with the goal of modernizing outdated requirements and providing all property owners with predictable regulations

Why isn't the new zoning code robust enough to be applied to the Walter Reed campus?

In addition, what is proposed for the Walter Reed campus are a series of custom provisions that significantly increase MOR density and height from what is permitted in the surrounding neighborhoods while eliminating the community review otherwise provided.

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Therefore, if adopted, this proposal effectively ends meaningful community input for the duration of a project that will likely take 20+ years to complete

Small Area Plan Calls For 65 Feet, NOT 85 Feet In The Town Center – WR-2

The proposal calls for an 85-foot-tall building in the WR-2 section of Walter Reed as a matter of right. This is a 70 percent increase in height compared to the 50-foot maximum heights permitted as an MOR in the surrounding residential and commercial properties. (See attached Ward 4 Zoning Map)

Representatives from OP and the developer have explained that 85 feet does not differ from what was detailed in the Small Area Plan. This is not true.

The drawings on Pages 86 and 87 of the Small Area Plan clearly show buildings that are 65 feet above grade on both the 12th and 13th Street sides. So, OP is calling for a 30 percent increase in height over the Small Area Plan (See attached Section 3, Redevelopment Framework Recommendations, 3.3 Sub-Area Urban Design Principles, Exhibits 4-118, 4-117, 4-120, and 4-121 on pages 86 and 87)

Also, note that these exhibits are from the OP web site and that OP staff have assured us that they are the final, adopted SAP, despite the caption “Progress Internal Draft – For Review Purposes Only” on the top of the page.

Therefore, the claim that OP and the developer make that the SAP specifies heights of up to 85 feet is inaccurate. Heights at the Town Center should be limited to 65 feet MOR. The community should be able to review any proposed design with a height above that limit.

Community review via the Planned Unit Development (PUD) process is especially vital in a project that will take decades or more to develop. While there will be design review for historic buildings, what the proposed regulations call for is giving the developer carte blanche for much of a large-scale project without further input from neighbors, even though conditions could change dramatically over the next twenty or so years.

We support Advisory Neighborhood Commission 4B’s March 25, 2013 recommendation that calls for “*significant transparency and continuous public participation in the decision-making throughout the entire development process*”

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Increased Heights Will Set Precedents for the East Side of Georgia Avenue

It is also likely that if an 85-foot MOR height is permitted at Walter Reed, or if other significant height increases are permitted for sites on or close to Georgia Avenue, property owners on the east side of Georgia will apply for and win height increases for their properties above the limits of the C-2-A zone (50 feet MOR). Property owners are putting together larger parcels. One developer owns a key block between Fern and Elder directly across the street from Walter Reed. Increasing heights on the east side would be incompatible with the low-rise single-family homes that sit as close as 30 feet from the C-2-A property lines.

Fern Street And Elder Street – WR-1

Again, the zoning proposal deviates from the Small Area Plan.

The zoning proposal calls for townhomes with a maximum height of 40 feet, or alternatively, 50 feet on Fern Street and 45 feet, or alternatively, 55 feet, for “any other lot ” (We assume this refers to Elder Street) (See Section 3501 2 of the zoning proposal, attached.)

Here’s what the Small Area Plan says about these townhouses: “For example, the homes along Fern Street could be three stories, reflecting similar heights of the existing homes across the street while increasing the building height to four stories along Elder Street where the grade is lower.” (See pages 78 and 79, including Exhibit 4-102 of the Small Area Plan The SAP also provides 20-foot rear yards and 20- foot setbacks from the street In contrast, the Office of Planning is not recommending front or rear setbacks in their proposal.

We support the lower maximum height specified in the SAP. We also support the 20-foot rear yards and 20-foot setbacks shown in the SAP, as an amenity to residents and as a needed requirement for stormwater management and other critical environmental concerns. This is comparable to homes in the community

We note and support ANC 4B’s March 25, 2013 recommendations for buildings fronting on Fern Street and Georgia Avenue

We also support Advisory Neighborhood Commission 4A’s recommendation that units on Fern and Elder be large enough for families and built in strings of five to permit designs that are compatible with the existing homes across the street. However, requiring a minimum of 2,000 square feet per unit, as ANC 4A recommends, may make these units unaffordable for lower-

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income families The Zoning Commission should reduce the minimum to 1,200 square feet, a size that can accommodate a small family.

Georgia Avenue Between Dahlia & Elder - WR-3, Land Bay F

We support and appreciate the plaza between Dahlia and Elder Streets and the OP proposal's requirement to preserve 90 percent of the existing mature trees. However, the language that applies to this section of Georgia Avenue says the purpose is to maintain "a sensitive scale of development in relation to properties on the east side of Georgia Avenue." (See Section 3503.1, page 8 of the zoning proposal, attached)

In spite of this, the OP proposal permits a 60-foot-tall MOR building within 100-feet of Georgia Avenue and a 75-foot –tall MOR building further back. (See Section 3503.2, page 9, of the zoning proposal, attached)

These 60 and 75-foot-tall buildings would be directly across the street from low-scale row houses that are not more than 30-feet-tall. Permitting this height difference of 100 percent and more between the east and west sides of Georgia Avenue threatens the viability of these homes as residences

Sixty and 75-foot-tall buildings are not sensitive to that block of Georgia Avenue, as stated in the OP proposal. Accordingly, the zoning proposal contradicts its own stated objectives as well as those of the Small Area Plan.

The following is a quote from page 84 of the Small Area Plan "To create continuity with the existing context, new construction should complement the historic context of Building 1 and the surrounding community." (See attached.)

Again, the zoning proposal deviates from the Small Area Plan

We ask that the Walter Reed zoning regulations limit MOR height to 50 feet between Dahlia and Elder. This is what is currently permitted on the east side of Georgia Avenue. And 50 feet is still 67 percent taller than the existing rowhouses. Certainly anything taller than 50 feet should only be permitted as a PUD. There should also be set-back requirements for the west side of Georgia that are similar to the east side row houses

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Protecting “The Great Lawn” and Adjacent Recreation Space – WR-6

We support OP’s proposals to preserve the “Great Lawn” as permanent open space. Clearly, it is the most important public space at Walter Reed. However, the proposed language needs to be clarified.

The chart on page 16 of the zoning proposal (WR-6) for Land Bays J.1, J. 7, G.2, G.6 and K.4 shows an FAR of “0.” But the language below the chart allows for new construction and park and recreation use on Land Bay J 7. The language needs to be consistent. (See attached.)

Measurement Standards

The developer states that Walter Reed’s hilly topography limits the negative impact of additional height. However, where and how height is measured is important and standard construction techniques, including berms, can change the impact of a building. The adopted zoning language should be uniform throughout, should require that heights are to be measured from the existing rather than the finished grades, and should require that topography be documented prior to the adoption of the regulations.

For example, the proposed Section 3508.3 states: “In the WR-8 Zone, the maximum height of buildings or structures shall be as follows: (a) Within twenty-five feet (25 ft.) of the setback specified in § 3508.4, fifty feet (50 ft.) *above the finished grade* at the middle of the Aspen Street building façade; and (b) Elsewhere, sixty-five feet (65 ft.) as measured *from whichever measuring point is chosen* for the building for the purpose of measuring height.” [emphasis added] (See attached.)

We note that the above paragraph not only details two different ways to measure height, but in one case effectively gives the developer *carte blanche* to measure however he/she wants.

Affordable Housing

In view of the severe shortage of available affordable housing, we agree with Advisory Neighborhood Commission 4B’s recommendations which ask that 25 percent of the housing at Walter Reed be designated as “affordable” as defined by city regulations and that the zoning regulations be amended to specify 25 percent-affordable housing. If not, the zoning regulations should require at least the developer’s commitment of 18 percent.

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Also, the public should understand what the developer will be required to provide separately from the NOI agreements and the zoning regulations should spell this out in detail, including income levels and the size and type of the units

In addition, housing for families should make up the majority of the affordable housing. We support setting aside at least half of the affordable units for families that are defined as “low income,” or with incomes of approximately \$50,000/year for a family of four. These requirements should be included in the zoning regulations.

Public Transit and Parking

Walter Reed is about three-quarters of a mile from the closest Metro Station, and streetcar service, though discussed in the Small Area Plan, is far from certain. What remains is bus service. The SAP acknowledges that WMATA and the city will need to develop additional bus services.

We recommend that the zoning regulations include a formula for the developer’s role in providing new and innovative public transit services at Walter Reed.

The SAP anticipates that parking demand will range from 2,317 to 3,411 spaces and provides a formula that differentiates the amount of parking needed for different uses.

Although, the proposed zoning reflects the SAP estimate by providing *up to 3,400 spaces*, it also says those spaces “*can be distributed throughout the site as the developer chooses*” (See page 7 of the Summary Recommendation, attached.)

Developers elsewhere in the city are required to provide automobile parking based on use formulas. We think that zoning regulations for a project as large and complex as this one, particularly a project that will take 20 or more years to complete, need similar specificity.

Compare the proposal’s lack of detail with respect to calculating car parking to what the proposal requires for bicycle parking. There are seven pages of formulas and regulations for everything from firearm sales to emergency shelters.

The automobile parking regulations should include the formulas detailed on page 124 of the Small Area Plan – 1.5 spaces per 1,000 square feet of retail, 1.0 spaces per 1,000 square feet of office, 0.5 spaces per apartment unit. (See page 124, Redevelopment Framework Recommendations, Transportation Recommendations, attached.)

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Private Streets

We question the need for private streets given that the DC Department of Transportation (DDOT) is responsible for a number of improvements and services, including signage, street trees, sidewalks, and plowing, provided according to municipal standards. We think that the best public policy is to require that all streets be public and under DDOT jurisdiction. An important benefit is preserving the public's ability to provide input on any proposed changes.

Thank you for your consideration.



Advisory Neighborhood Commission 4B
Government of the District of Columbia
6856 Eastern Avenue, NW - Suite 314
Washington, DC 20012

RESOLUTION #15-0202
Recommendations Regarding ZC 14-22,
Text and Map Amendment to Create and
Implement the Walter Reed Zone
Proposed for Adoption February 23, 2015

Advisory Neighborhood Commission 4B is concerned about several key provisions in the Proposed Text and Map Amendment for the Walter Reed site. The following observations and recommendations are submitted to the Zoning Commission for its consideration and response:

Height and Design

- The community surrounding Walter Reed is predominantly R-1-B (single-family homes, 40 feet tall), C-2-A (mixed use, 50 feet tall), R-5-A (residential, 40 feet tall), R-5-B (apartments, 50 feet tall), and C-3-A (mixed use, 65 feet tall). The Walter Reed proposal dramatically increases maximum heights to permit buildings of up to 85 feet tall. If adopted, this would “Manhattanize” the community and result in a major adverse visual impact on the existing character of Takoma Park DC.
- The proposal would also permit 18-foot-wide townhouses that are up to four or five stories tall, a design that is not compatible with the adjacent surrounding community.
- It is hard for many residents to visualize the proposal.

RESOLVED:

- The Commission recommends that all building heights be capped at 65 feet to ensure that Walter Reed development is more visually compatible with the existing bulk, scale, and massing of development on the east side of Georgia Avenue.
- The Commission recommends that townhome designs, heights, and widths at Walter Reed should be more compatible with those on nearby Georgia Avenue and on Fern Place, NW.

- The Commission recommends that prior to the public hearing, the Office of Planning should provide drawings and models that show the proposed heights, densities, and other key features of the Walter Reed proposal in context with the surrounding neighborhoods.

Affordable Housing

The proposal calls for only 10 percent “affordable” housing at the site, while noting that the Developer has committed to 18 percent.

RESOLVED:

That, in view of the severe shortage of available affordable housing, the Commission strongly recommends that 25 percent of the housing at Walter Reed be designated as “affordable” as defined by city regulations. At a minimum, the zoning regulations should require the Developer’s commitment of 18 percent.

Transportation and Parking

- It is hard to determine parking requirements at the Walter Reed site without details about mass transit, including specific plans and routes for bus and streetcar.
- The proposal includes a great deal of detail about bicycle parking.

RESOLVED:

That the Commission recommends.

- that the Office of Planning and the Department of Transportation be required to provide details about mass transit at Walter Reed, including specific plans and routes for bus and streetcar, prior to the adoption of these zoning regulations
- that parking needs to be available for every residential unit, and that parking spaces on private streets should not be counted toward the total number of required parking spaces at the site
- that the Developer should also be required to provide additional services, such as electric car charging stations and parking for car sharing services as well as expanded handicapped parking capacity

FURTHER RESOLVED:

That Commissioner Andre Carley, ANC 4B01, is hereby authorized to serve as the Commission's representative in all matters relating to this resolution

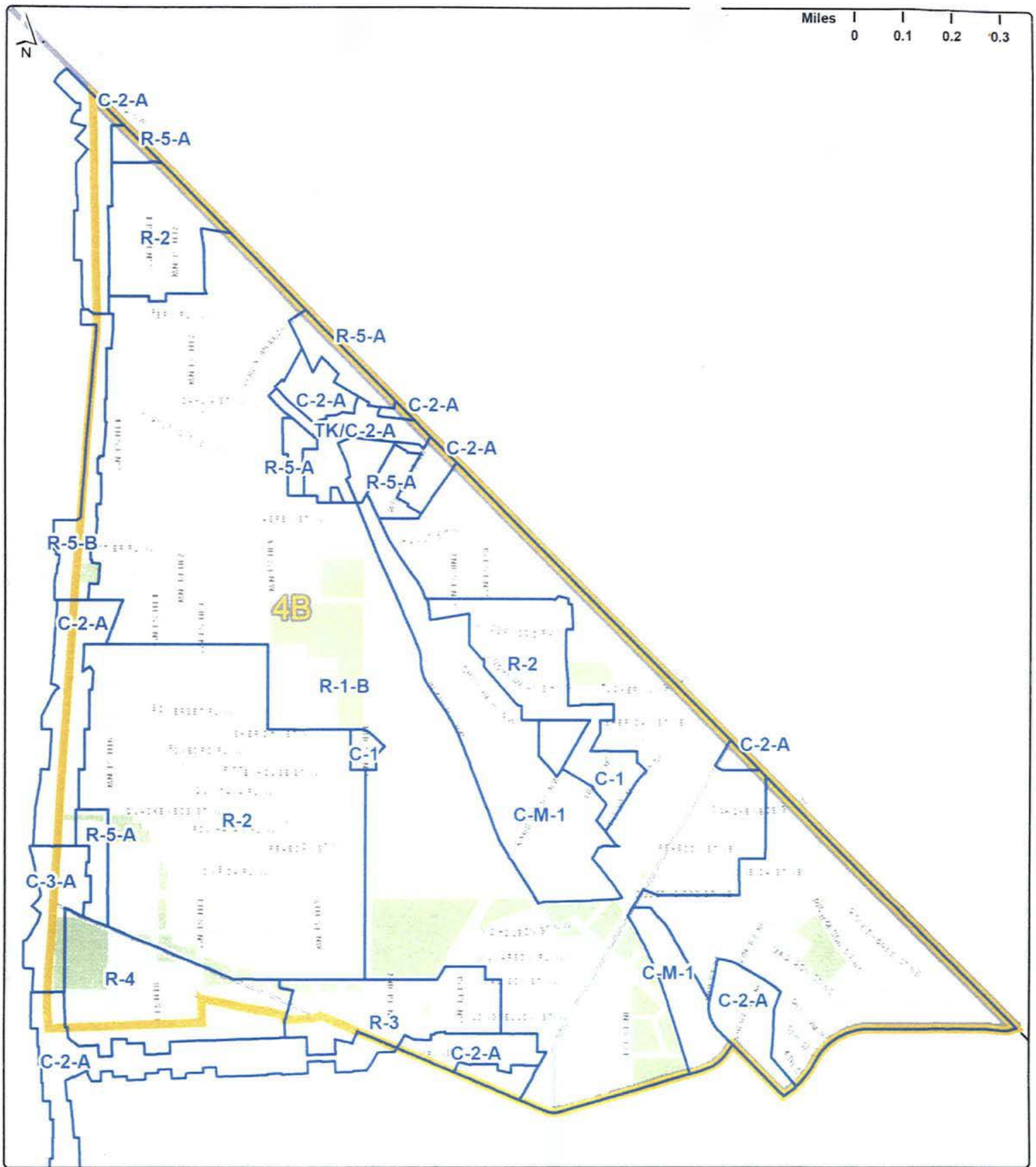
FURTHER RESOLVED:

That, in the event the designated representative Commissioner cannot carry out his representative duties for any reason, the Commission authorizes the Chairperson to designate another Commissioner to represent the Commission in all matter relating to this resolution.

FURTHER RESOLVED:

Consistent with DC Code §1-309, only actions of the full Commission voting in a properly noticed public meeting have standing and carry great weight. The actions, positions and opinions of individual commissioners, insofar as they may be contradictory to or otherwise inconsistent with the expressed position of the full Commission in a properly adopted resolution or letter, have no standing and cannot be considered as in any way associated with the Commission.

ADOPTED by _____ vote at a regular public meeting (notice of which was properly given, and at which a quorum of _____ of eight members was present) on February 23, 2015 by a vote of ____ yes, ____ no.



ANC 4B Zoning



Office of Planning ~ February 25, 2013

Government of the District of Columbia

This map was created for planning purposes from a variety of sources. It is neither a survey nor a legal document. Information provided by other agencies should be verified with them where appropriate.

-  Zoning Districts
-  2012 Ward Boundaries
-  2013 ANC Boundaries

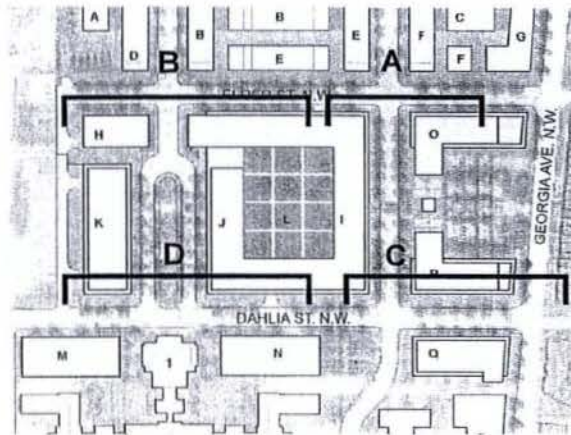


Exhibit 4-119: Site Sections Key Plan - Town Center. Source: Perkins+Will

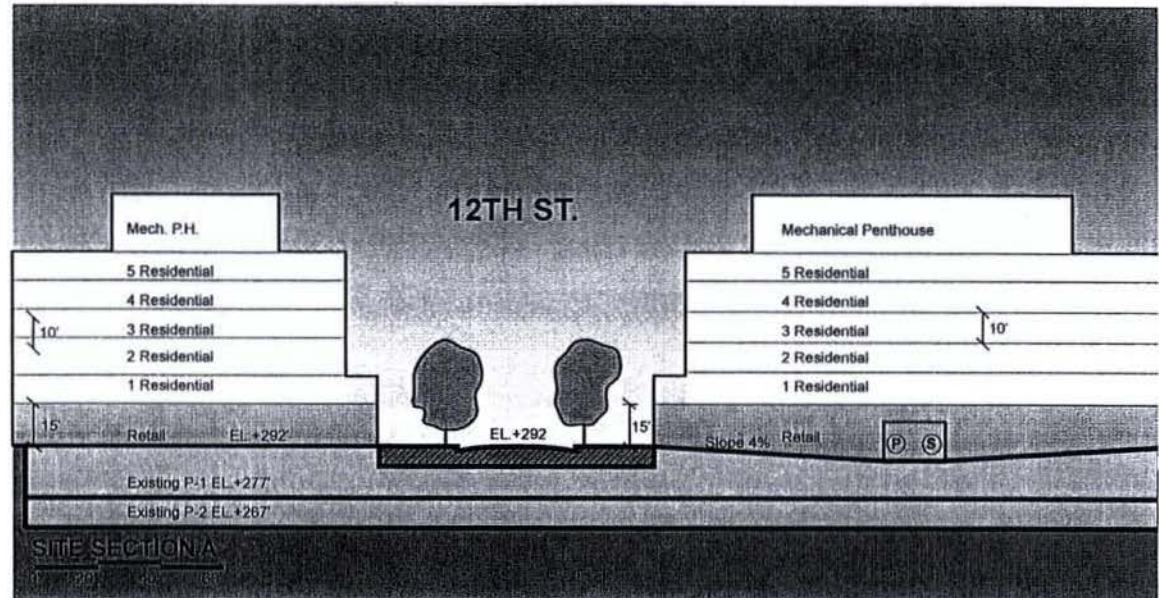


Exhibit 4-118: Town Center Site Section. Source: Perkins+Will.

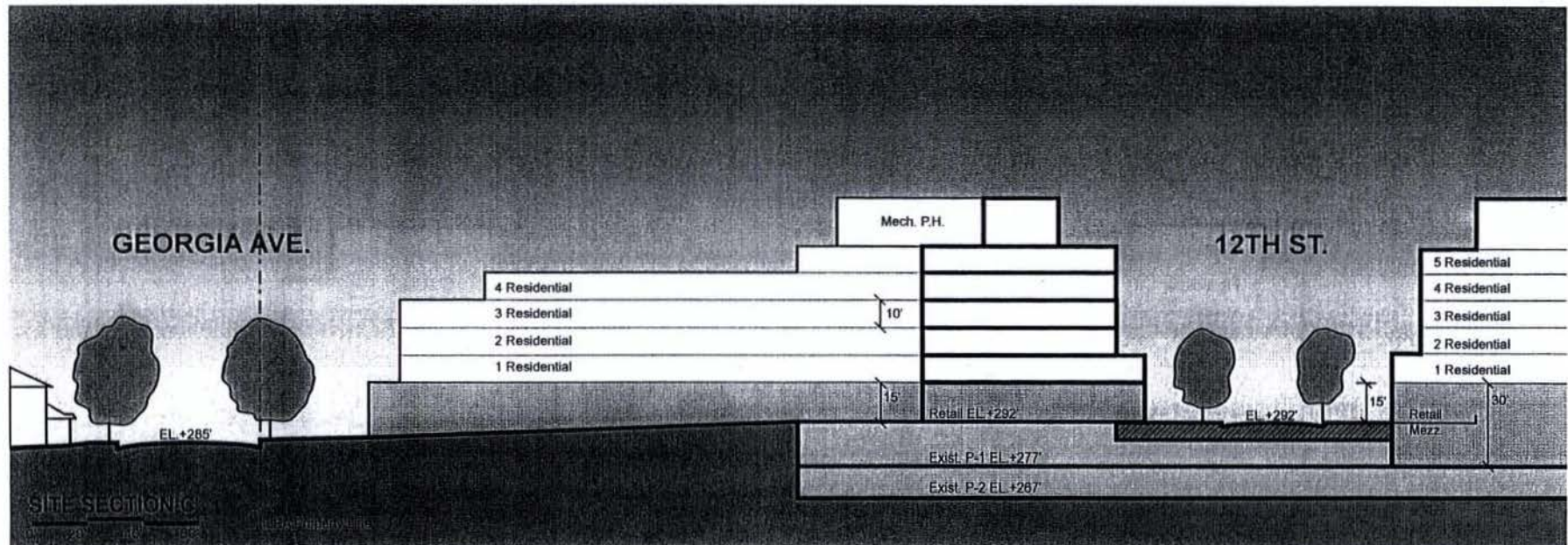


Exhibit 4-117: Town Center Site Section. Source: Perkins+Will.



WALTER REED ARMY MEDICAL CENTER

SMALL AREA PLAN - DRAFT FOR PUBLIC COMMENT - JANUARY 28, 2013

3. REDEVELOPMENT FRAMEWORK RECOMMENDATIONS
3.3 SUB-AREA URBAN DESIGN PRINCIPLES

175' Right-of-way Beyond

13TH ST.

Mechanical Penthouse

5 Residential

4 Residential

3 Residential

2 Residential

Residential EL.+307'

10'

Slope 7%

EL.+292' Beyond

Exist. P-1 EL.+277'

P-1 New

Exist. P-2 EL.+284'

SITE SECTION B

0' 30' 45' 60'

Mechanical Penthouse

5 Residential

4 Residential

3 Residential

2 Residential

1 Residential EL.+307'

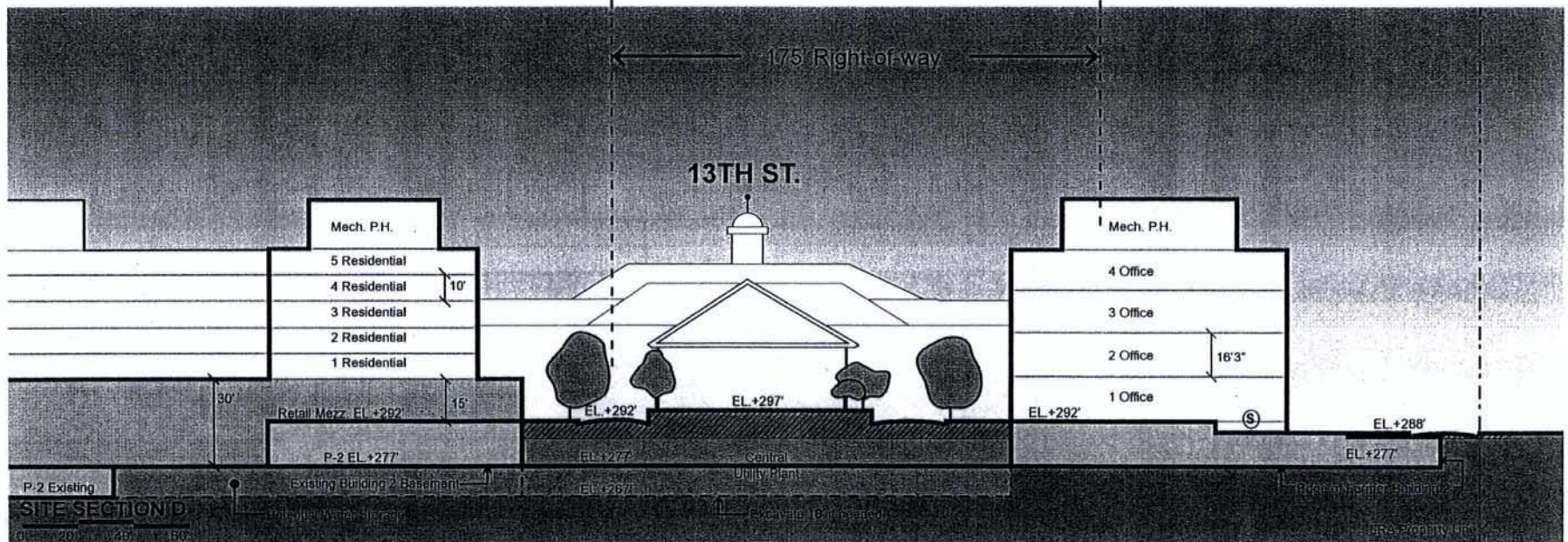
10'

Residential P-1 EL.+297'

EL.+310'

Edge of Inner Building

LRAP Property Line



Place Making

Amenities

Elder Street terminates at the boundary of the DOS Site to the west and creates a unique, yet intimate open space. The character of this area should mirror a quiet residential setting, making it an ideal location for a small scale community garden and a family recreation area.

Building Orientation

All proposed new buildings and major entrances should be oriented towards the street or near corners wherever possible. Proposed townhomes in this sub-area should be designed to front along 12th, 13th, Fern and Elder Streets, thereby encouraging visual interest for pedestrians and further establishing the residential nature of the area. To help strengthen the Georgia Avenue and Fern Street intersection, the proposed mixed use building here would have access at grade and increase maximum allowable height at the corner.

Alleyways proposed throughout the sub-area help further establish a “center of the block” feeling throughout rather than the having the backs of buildings facing sidewalks, and thus should be designed to provide a pleasant, safe environment for pedestrians to walk through and for residents to look at. The area between the extended 12th and 13th streets would have mostly residential frontages facing each other, possibly with neighborhood serving retail on occasion on the south side of Elder Street.

Height and massing

Pursuant to the Reuse Plan, proposed building heights should range from 3 to 4-stories, with a Garage and Basement beneath. For example, the homes along Fern Street could be 3-stories reflecting similar heights of the existing homes across the street, while increasing the building height to 4-stories along Elder Street where the

grade is lower. The low-rise mixed-use building facing Georgia Avenue in this area should fit within the varying building height context that currently prevails on Georgia Avenue. Building height and massing should be engaging to the pedestrian experience.

Public Realm

The following are basic guidelines mainly for the public realm, defined as the area between the building facades — comprising the road, sidewalk, site furnishings, trees and open spaces that combine to form the street’s character:

- **Rights-of-Way:** Provide minimum right-of-way (ROW) widths of 90 feet, compliant with DDOT’s standards and to enhance this sub-area’s opportunity for multi-modal connections. Other priorities should include sufficient room for front yard setbacks, curb-side stormwater management, on-street parking, and bike lanes as feasible.
- **Pedestrian Zone:** Explore minimum 20 feet pedestrian zones distance from building face to curb for landscaped front yards, pedestrian circulation and curbside rain gardens and trees. Refer to DDOT’s standards for the planning and design of sidewalks and streets, such as tree planting guidelines and selection of site furnishings and materials.
- **Green Elements:** Integrate rain gardens in sidewalks for storm water management where feasible. Encourage the use of permeable materials to manage stormwater runoff.
- **Curb Cuts:** Minimize curb cuts throughout the blocks.

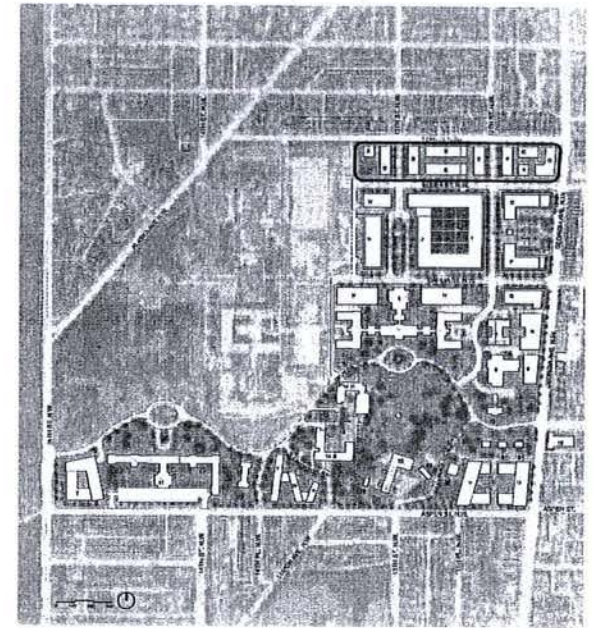


Exhibit 4-100: Sub-Area Key Plan 1. Source: Perkins+Will.



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PROGRESS INTERNAL DRAFT – FOR REVIEW PURPOSES ONLY

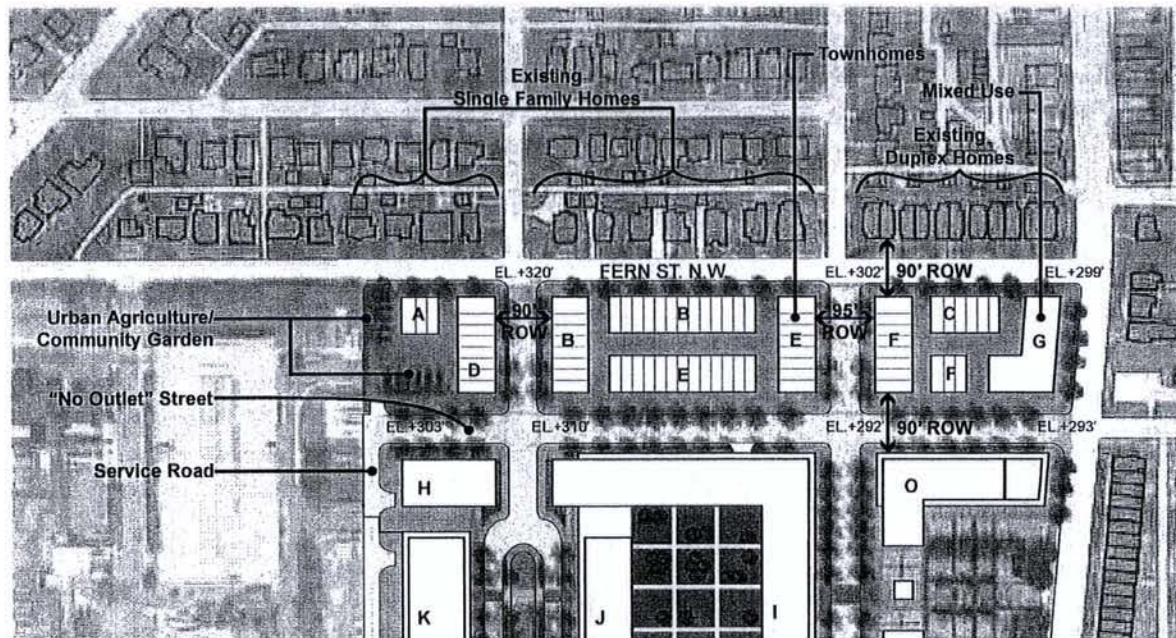


Exhibit 4-101: Sub-Area Plan - Fern Street. Source: Perkins+Will.

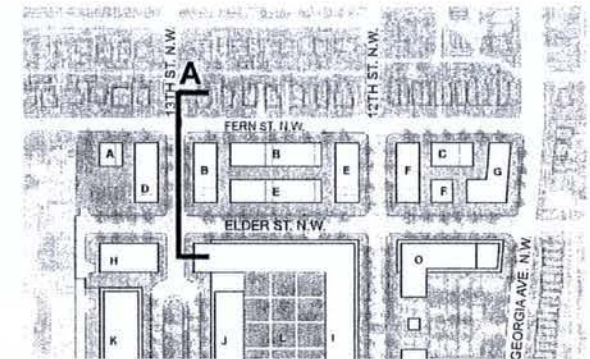


Exhibit 4-103: Site Section Key Plan - Fern Street. Source: Perkins+Will.

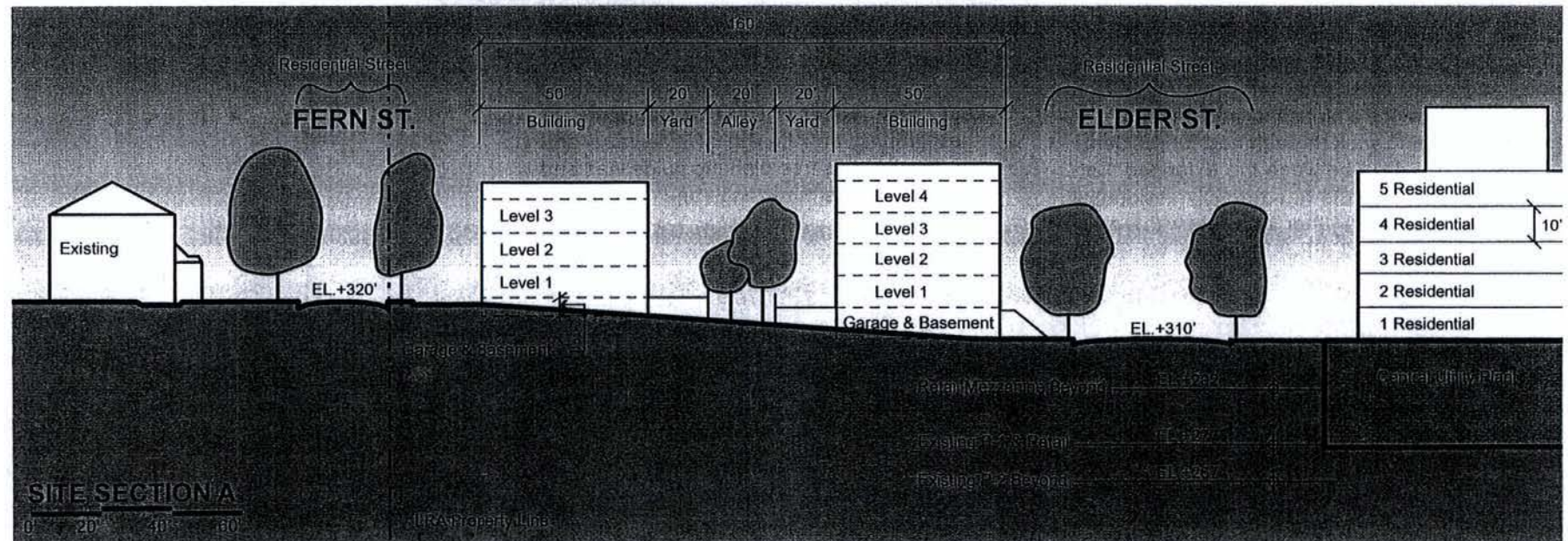


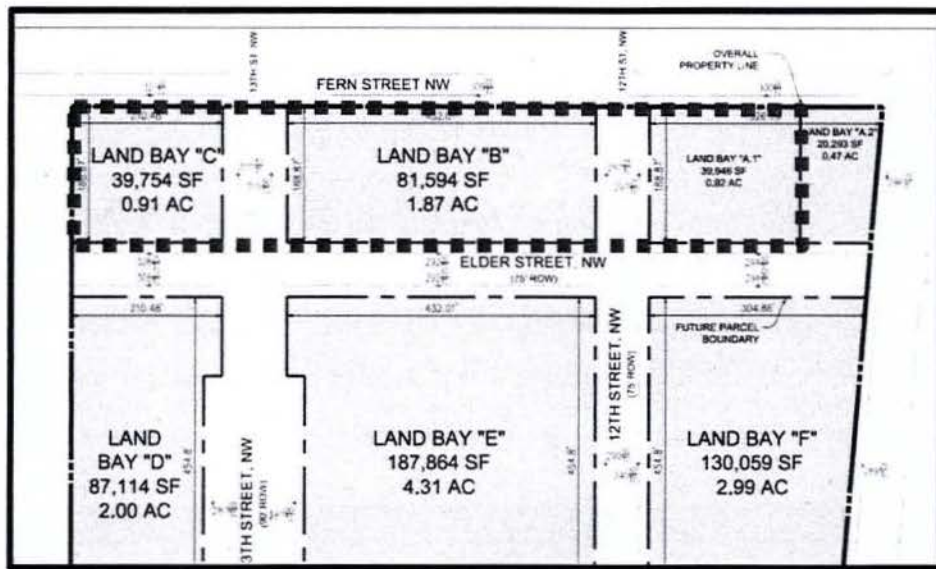
Exhibit 4-102: Fern Street Sub-Area Site Section. Source: Perkins+Will.



WALTER REED ARMY MEDICAL CENTER

SMALL AREA PLAN - DRAFT FOR PUBLIC COMMENT - JANUARY 28, 2013

3. REDEVELOPMENT FRAMEWORK RECOMMENDATIONS
3.3 SUB-AREA URBAN DESIGN PRINCIPLES

3501 WR-1 ZONE

3501.1 The WR-1 zone is intended to:

- (a) Provide for residential development that complements the character of nearby established residential neighborhoods;
- (b) Transition from the low to moderate scale residential uses north of Fern Street to the medium-density commercial and residential uses proposed for south of Elder Street; and
- (c) Discourage driveway access directly from the street to private off-street parking.

3501.2 The development standards for the WR-1 zone are set forth in the following table:

WR-1 (Land Bays A, B and C)	Lot Width (min.)	Height (max.)	Stories (max.)	Lot Occupancy (max.)	Pervious Surface (min.)	Side Yard Setback (min.)	Rear Yard Setback (min.)
Lots with any frontage on Fern Street	18 ft.	40 ft. [alt. 50]	3 [alt. 4]	70%	10%	None required; 4 ft. if provided	None required [alt. 20 ft.]
Any other lot	18 ft.	45 ft. [alt. 55]	4 [alt. 5]	70%	10%	None required; 4 ft. if provided	None required [alt. 20 ft.]

3501.3 The maximum number of permitted dwelling units on any lot shall be two (2), which includes both principal and accessory units.

3501.4 For any Inclusionary or affordable residential unit that is administered through the Department of Housing and Community Development, the minimum lot width shall be 16 ft.

The 13th Street promenade to the west of the Town Center, refers to the green strip that extends from Building 1 nearly to Elder Street, exposing an historic architectural element that was once hidden: the Building 1 rear facade. This open space is framed by buildings to the east and west and is focused on Building 1 as its historic terminus and has the potential to become a campus setting or intimate park.

Place Making

Amenities

In the Town Center, water features, decorative signage, and native plantings would help activate the front door to Georgia Avenue and create an exciting environment that both visitors and neighborhood residents alike can enjoy year-round. Pavilions would further help activate the space.

In addition to the actual Town Center, the 13th Street promenade and the rooftop courtyard between 12th and 13th Streets are open spaces suitable for passive recreation.

Building orientation

In order to keep all sides of the buildings lively, the buildings framing the Town Center on Elder, Dahlia and 12th Streets will have no blank walls: one "front" faces the Town Center and the other "front" faces the street. Major retail entrances for

the rest of the area should be located on 12th and 13th Streets, while residential entrance lobbies should front along Dahlia and Elder Streets. Minor retail entrances should be intertwined with the residential entries if needed. The intent is to create a nearly-continuous, pedestrian active edge, comprised of glass storefronts and entrances leading to proposed uses.

Height and massing

To create continuity with the existing context, new construction should compliment the historic context of Building 1 and the surrounding community. For example:

- Preserve the existing mature tree cover and create an open space (the actual Town Center) across the existing row of town-homes on Georgia Avenue (as seen "Exhibit 4-116: Town Center Site Section" on page 86).

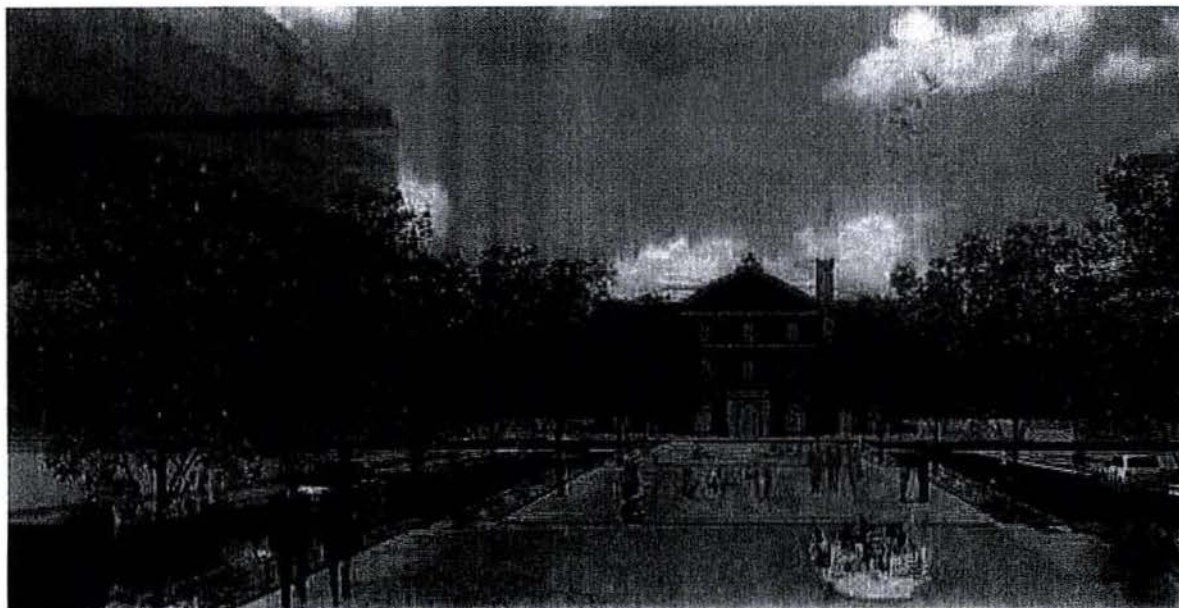


Figure 4-113: 13th Street "Promenade". Source: Perkins+Will and Lee & Associates, Inc.



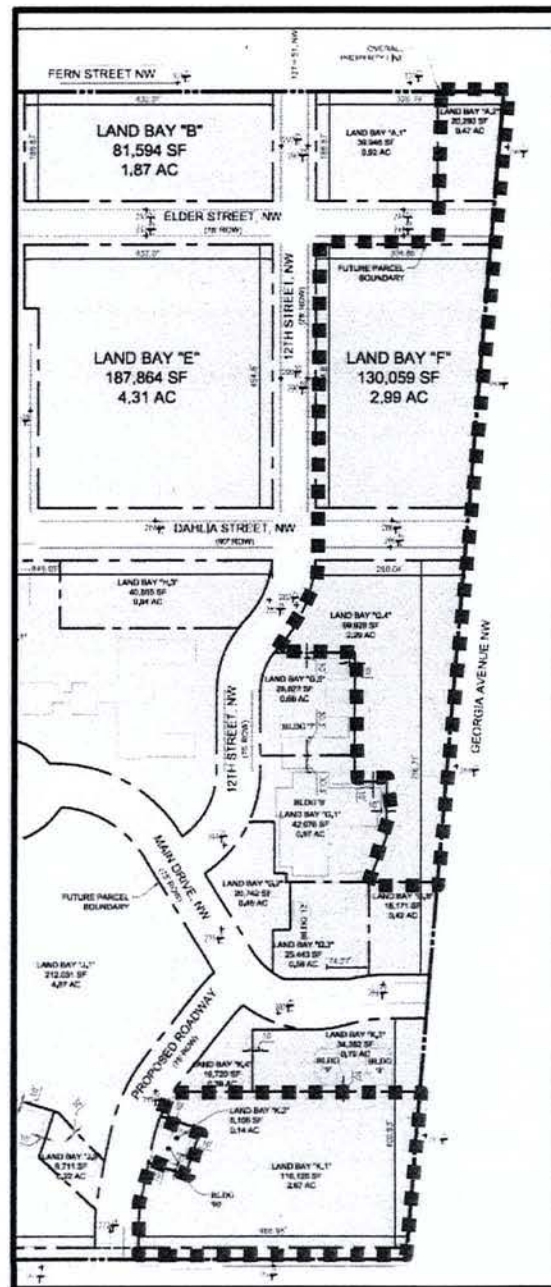
Figure 4-114: 1950's view looking north of Building 1 and 13th Street. Source: AFIP.



WALTER REED ARMY MEDICAL CENTER

SMALL AREA PLAN - DRAFT FOR PUBLIC COMMENT - JANUARY 28, 2013

3503 WR-3 ZONE



3503.1 The WR-3 zone is intended to:

- (a) Provide for moderate to medium density commercial and residential development that activates Georgia Avenue frontage through enhanced ground floor retail opportunities, a more uniform street wall, and publically accessible plazas;
- (b) Maintains a sensitive scale of development in relation to properties on the east side of Georgia Avenue as appropriate; and
- (c) Preserve existing and encourage new green and open space to activate site, and to

allow for recreation opportunities as appropriate

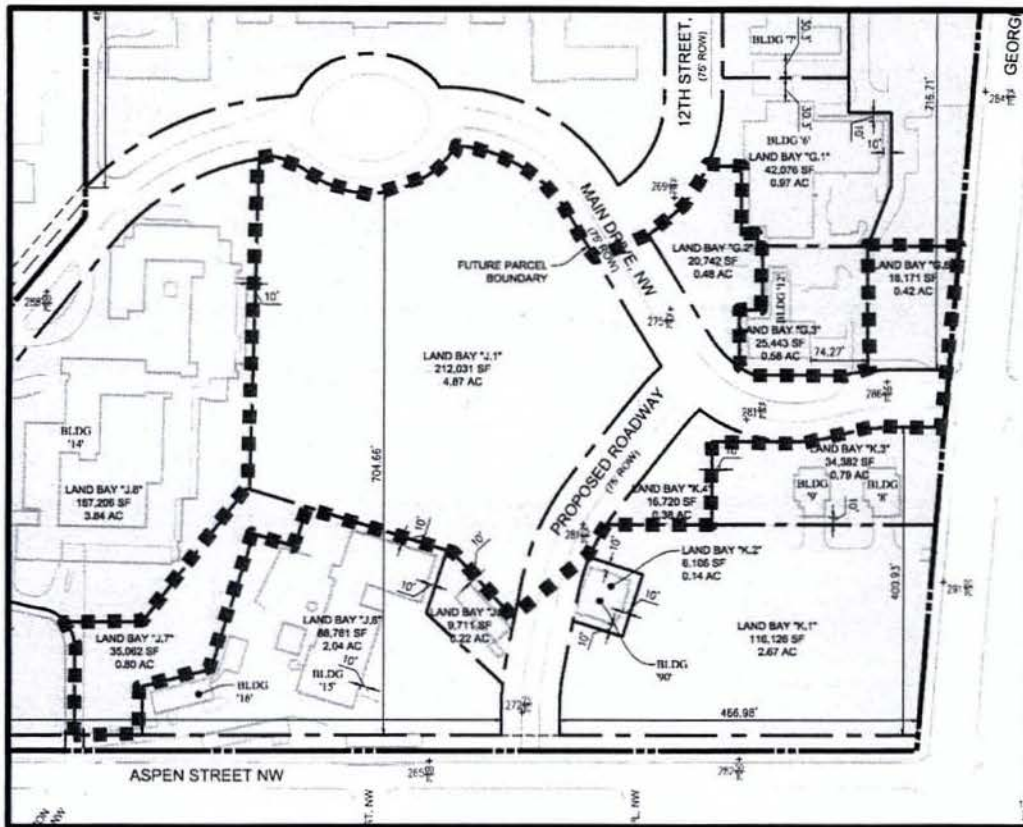
3503.2 The development standards for the WR-3 zone are set forth in the following table:



WR-3	Height (max.)	Stories (max.)	Floor Area Ratio (max.)		Residential Lot Occupancy Above the Ground Floor (max.)	Setbacks
			Total	Non-Residential Use		
Land Bay A 2	70 ft	5	3.5	1.0	80%	n/a
Land Bay F	See § 3503.3	6	1.75	1.0	80%	n/a
Land Bay G 4	75 ft	6	3.0	1.0	80%	n/a
Land Bay K.1	70 ft.	5	2.75	1.0	80%	See § 3503.6

- 3503.3 For Land Bay F, the maximum height of buildings or structures shall be 60 feet within 100 feet of Georgia Avenue, and 75 feet elsewhere.
- 3503.4 For Land Bays F, G.4 and K.1, the non-residential maximum FAR requirement shall be measured by sub-area, as opposed to per building.
- 3503.5 Ground floor lot occupancy is permitted up to 100%, regardless of use, and except as limited by § 3503.10.
- 3503.6 Non-residential uses or building entrances to any use shall occupy one hundred percent (100%) of the ground floor building façades facing the plaza constructed pursuant to § 3503.10.
- 3503.7 In Land Bay K.1, any new construction shall be set back no less than 20' from the Aspen Street property line as it exists as of January 1, 2015
- 3503.8 In the WR-3 zone, no less than 70% of the façade of buildings located along Fern Street, Elder Street, Dahlia Street, Aspen Street and Georgia Avenue shall be built to the property lines abutting the subject street right-of-way to a height of not less than twenty-five feet (25 ft.), except that
- (a) The requirements of this section shall not apply to the portions of building façades that front on a plaza established pursuant to § 3503.10
 - (b) The height requirement of this section may be reduced to eighteen feet (18 ft.) if the roof immediately above the 18 foot façade is occupied by a public or private outdoor terrace.

3506 WR-6 ZONE



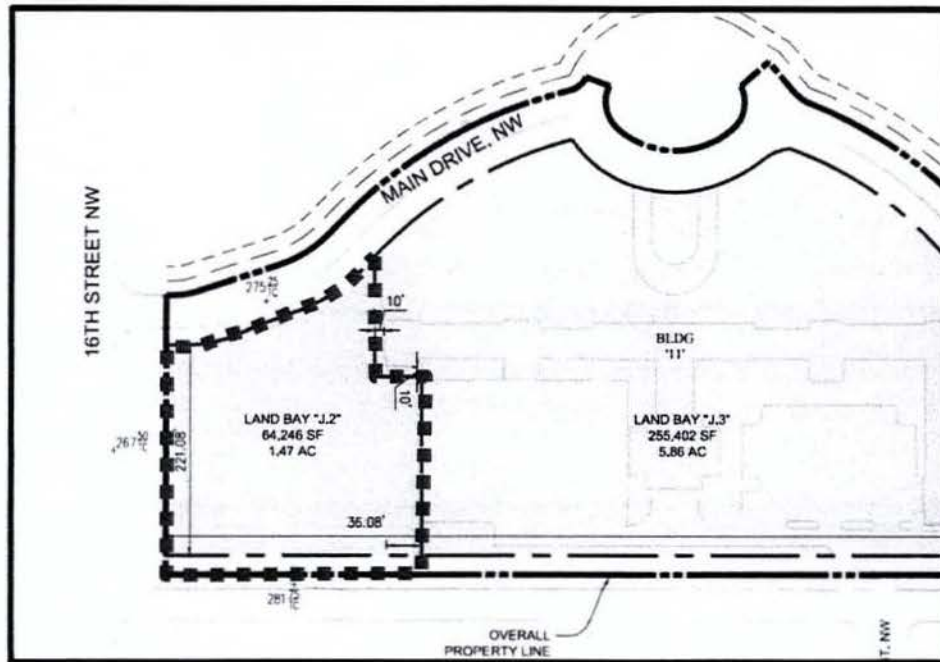
3506.1 The WR-6 zone is intended to:

- (a) Preserve the unique character of the Great Lawn and maintain the campus atmosphere at the heart of the historic Walter Reed campus, including the landscaped entrances to the WR zone around Main Drive and East and West Cameron Drives;
- (b) Assure that the Great lawn's permanent use is for its primary natural function as well as for enjoyment by the general public; and
- (c) Encourage continuous east/west green connections.

3506.2 The development standards for the WR-6 zone are set forth in the following table:

WR-6	FAR (max.)
Land Bays J.1, J.7, G.2, G.6, and K.4	0

3506.3 In the WR-6 zone no new surface parking lots are permitted.

3508 WR-8 ZONE

3508.1 The WR-8 zone is intended to:

- (a) Provide medium density residential development that is sensitive to existing development on the south side of Aspen Street.
- (b) Encourage open and green space suitable for sustainable infrastructure and amenities as appropriate.

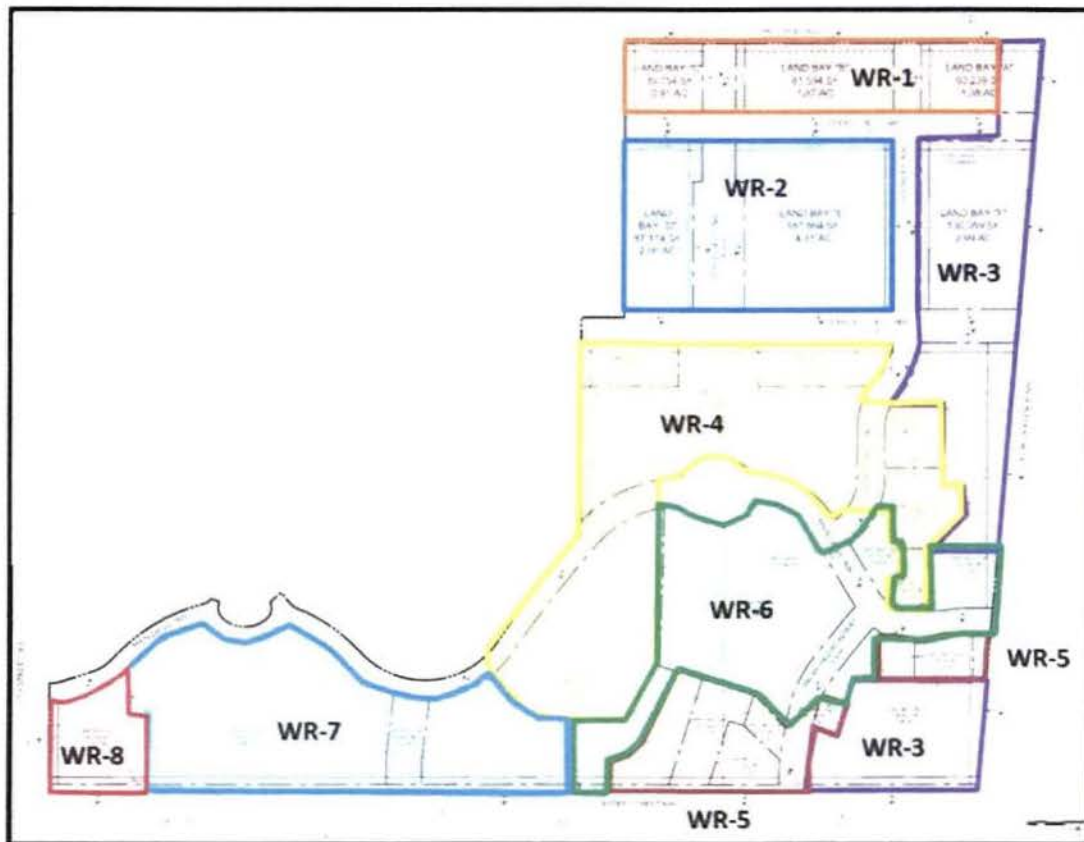
3508.2 The development standards for the WR-8 zone are set forth in the following table:

WR-8	Height (max.)	Stories (max.)	FAR (max.)	Lot Occupancy (max.)	Setbacks
Land Bay J.2	See §3508.3	5	3.25	80%	See §3508.4

3508.3 In the WR-8 zone, the maximum height of buildings or structures shall be as follows:

- (a) Within 25 feet of the setback specified in § 3508.4, 50 feet above the finished grade at the middle of the Aspen Street building façade;
- (b) Elsewhere, 65 feet as measured from whichever measuring point is chosen for the building for the purpose of measuring height. ←

3508.4 In the WR-8 zone, any new construction shall be set back no less than 20' from the Aspen Street property line, as it exists on January 1, 2015.



Parking

The SAP establishes a cap on the total number of parking spaces on the site. Similar to the St. Elizabeths zone, the proposed WR zone proposes a total number that can be distributed throughout the site as the developer chooses. The total number, 3,200, was based on a detailed traffic analysis that examined how many vehicles surrounding roadways could accommodate. Should the developer determine that additional parking spaces are necessary, they can apply for special exception relief to grant the extra spaces with a showing that the additional vehicles would not overburden nearby streets.

Affordable Housing

The zoning requires that development comply with Inclusionary Zoning, and through the DMPED solicitation the chosen developer has committed to provide 18% of the gross floor area across the entire site as affordable housing. OP recommends that all WR zones be subject to § 2603.1 of the IZ regulations, which would require 10% inclusionary units on any individual development site. In the alternative, the Commission could consider including some WR zones in § 2603.1 and some in § 2603.2, which requires 8% inclusionary units. While the total number of affordable units would remain the same, the alternative proposal could allow greater flexibility for the developer to provide a senior building, for example, which would concentrate affordable units.

and its trail network to the Metropolitan Branch Trail near Fort Totten

Parking and Car-Sharing Recommendation

The existing WRAMC campus features a number of parking facilities, including several large underground garages within the LRA Site. These facilities will remain on the Site following the demolition of their associated buildings. New parking facilities will supplement the existing garages and replace any parking that must be displaced due to major incompatibilities between existing parking structures and proposed new developments.

Parking Supply and Demand

The former WRAMC Site will generate the need to provide parking on-site and within a reasonable walking distance to the specific programs on campus. In the early phases of redevelopment of the former WRAMC campus, it is likely that parking demand will be at higher levels compared to when the campus is fully redeveloped and enhanced transit services are fully operational in the vicinity of the Site.

In order to address this situation, the following parking ratios for the major land use categories within the Site were employed to identify an initial parking demand goal to be reached with the proposed parking plan:

- 3.0 spaces per 1,000 s f of retail
- 2.0 spaces per 1,000 s f of office
- 0.7 space per apartment unit

These initial parameters yielded a future parking demand of approximately 3,411 parking spaces.

However, with the ultimate build-out of the development program, this total demand would be reduced because of a variety of factors:

- Transit enhancements in the vicinity of the LRA Site will likely increase the share of trips made by non-auto modes.
- Synergy between the various land uses on-site will reduce the number of trips with external origins or destinations, thereby reducing the need for parking within the former WRAMC campus.
- Phased parking would allow for higher parking ratios initially, with lower parking rates employed as future developments are constructed and the built parking facilities can be more effectively shared between complimentary uses with different peaks for parking demand like office and residential space.
- Implementation of aggressive Transportation Demand Management (TDM) measures that include parking demand strategies, updated zoning requirements, paid parking requirements, and transit incentives will help actualize the cost of parking and encourage the use of alternate travel modes by minimizing excess parking supply.

Because of these factors, it is anticipated that the ultimate parking demand would be lowered over time as the Site is developed. The parking ratios for the major land uses within the Site would ultimately be as low as the following parking ratios:

- 1.5 spaces per 1,000 s f of retail
- 1.0 space per 1,000 s f of office
- 0.5 spaces per apartment unit

The parking demand resulting from these lower parking ratios would be in the range of 2,377 parking spaces. The redevelopment of the former WRAMC campus proposes maintaining 1,566 structured parking spaces from the parking facilities present at the former Walter Reed Army Medical Center. A further 300 new curbside

parking spaces will be developed with the new internal street network.

The resulting total supply of 1,866 spaces that include the new curbside spaces and the maintained structured spaces will need to be supplemented with new parking as the Site is developed over time. Between 451 and 1,545 new parking spaces will need to be built as new development parcels are constructed in order to meet the ultimate parking demand of between 2,317 and 3,411 parking spaces.

Transportation Management Plan

In order to address the future traffic and parking demand associated with the projected program of uses, a Transportation Management Plan (TMP) as indicated in the TIS report (Appendix C) will be fully developed to manage the different modes serving the Site. The TMP is comprised of several elements including a strategy to serve on-site parking demand, a system for managing loading operations, and aggressive Transportation Demand Management (TDM) measures. These TDM measures serve as the key elements of the TMP and will promote alternative commuting options for the residents, visitors, and employees associated with the planned Walter Reed campus' uses.

In order to address the implementation of a TMP, the following TDM measures, which make up the TMP, have been identified as potential TMP elements that can be implemented as new buildings and projects are developed and eventually occupied. For additional details on the TMP, see the TIS Report located in Appendix C.

Transportation Coordinator

Individual new developments will designate a Transportation Coordinator, usually someone

