

D.C. Zoning Commission Hearing

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Case No. 14-22, Walter Reed Text and Map Amendments

Testimony of Nancy J. MacWood, Chair, Committee of 100 on the Federal City

July 24, 2015

Thank you for the opportunity to testify on proposed text and map amendments creating new zoning for the District's portion of the Walter Reed campus, a historic landmark. The Committee of 100 on the Federal City recommends that the Zoning Commission instruct the Office of Planning to replace proposed unique zones that lack traditional development standards with zones that are used throughout the city. It is incongruous that after more than 8 years of rewriting the District's zoning code that OP would abandon citywide zoning in favor of something that has no relationship to how our city has been planned and developed under the zoning code. This is a very important site and indeed the community has spent many hours creating a small area plan ("SAP") to guide its development. It seems that OP has ignored some significant provisions of the SAP and that lapse conflicts with Mayor Bowser's statements that communities will be involved in transparent development processes and not be left with a plan that never gets implemented as intended.

Basic Zones

The developed area surrounding the District portion of Walter Reed is almost entirely R-1-B with C-2-A zones on Georgia Avenue to the north and south of the site. I have provided a comparison chart showing the existing surrounding zoning standards compared to the proposed zoning standards. (See Attachment A). None of the proposed residential zones include minimum lot areas and only WR-1 proposes a minimum lot width of 18 feet, which is the smallest residential lot width allowed in the District. WR-1 is also the only residential zone where OP is offering the possibility of a rear yard requirement, all other residential zones, and possibly this one, would have no rear yard living space required. The proposed lot occupancy maximum in the proposed residential zones varies from the R-1-B standard 40% on 5.86 acres to 50 – 80% on the remaining 6.76 acres. Almost all the proposed heights in the new residential zones would exceed 40 feet and 3 stories.

Proposed Density

OP presents the density choices with the underpinning of the small area plan's division of the site into moderate and medium density sections. But it's deceptive in this case to translate general density prescriptions into actual development standards. For example, did the community envision moderate density residential on Fern Street would mean 18 foot lot widths, no rear yards, and row houses of 55 feet and 5 stories? Is OP wrong that moderate density as defined by the Comprehensive Plan could include 55 feet and 5 stories? It's a stretch since medium density residential is defined as 4 – 7 stories

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and that density level seems more compatible with the WR-1 development standards – the few that are mentioned. But, most importantly, is OP following the intent of the SAP and the community's desires with these density allowances? Or are potential developers dictating the density?

### Commercial or Mixed Use Proposal

The bulk of the site would be zoned commercial or mixed use. Again, OP is using the general density terminology used on the Comprehensive Plan Future Land Use Map ("FLUM") to argue that the proposed heights are consistent with the SAP. Here we have a little more information about what community intended. At WR-2 where OP is proposing 85 feet and 7 stories, the SAP (see Redevelopment Framework Recommendation, Urban Design Principles, Exhibits 4-119, 4-117, 4-120, 4-121) shows 7 stories but only 65 feet. Isn't it likely that the community relied on the exhibit rather than the vague medium mixed use density terminology?

### Missing Elevations of Proposed Development Envelope

Unlike other large public parcels being redeveloped, like McMillan and Barry Farms, this application does not include elevations that would provide a lot of information for the public and the Zoning Commission. Given the proximity of the developed blocks and the care that was taken in the SAP to recommend compatible scale and massing it makes sense, and is perhaps necessary, to show the proposed elevations next to the existing heights and scale of buildings. In addition, the site is hilly and placement of certain heights on the site could be significant. This is another reason to require elevations.

There are three other issues the Committee of 100 would like to bring to your attention.

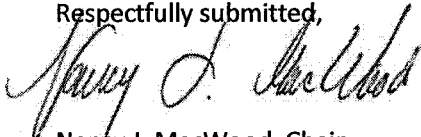
1. In WR-1, 5, 6, 7, and 8 the matter of right height, number of stories, and FAR are the maximum permitted if a PUD were filed. OP may believe that this provides predictability but what it really allows is bonus density with nothing in return – no public benefits, no additional environmental benefits, no input or participation from the Advisory Neighborhood Commission or the public. This style of zoning is not allowed in other parts of the city and developers should not be gifted with bonus density. Is OP asking the Zoning Commission to supplant a public PUD process with an OP and DMPED conclusion that their administrative decision on height and density is good enough? **This is an irregular and inappropriate advantage being offered to developers on a public site where one would expect the use of traditional zoning to extract the best result for the community throughout the development process.**
2. The affordable housing component of this proposal is not supportable. OP is proposing 10% of the gross floor area per Inclusionary Zoning requirements or alternatively, limiting 10% to WR 1, 4, and 5 and reducing the commitment to 8% in WR-2, 3, 7, and 8. This is, or will be, a public land site and the Council voted last year that there should be a minimum of 30% affordable housing on public land. The Zoning Commission can insist that DMPED and OP provide a level of affordable housing through a requirement on this site. District residents have been clear that this is the number one issue in the city and that not enough is being done to address this issue.

**Here is an opportunity that is being squandered and the Zoning Commission should not endorse this planning mistake.**

3. The parking proposal submitted by OP does not reflect the parking scheme in the SAP. Required minimum parking at lower rates for many uses than currently required in the zoning code were included in the SAP. OP has eliminated the SAP parking formulas and replaced them with a maximum number of new spaces unrelated to potential uses. The public and the ANC would have no predictability because each developer would only be required to notify DCRA of how many spaces they were creating in a particular zone and how many spaces remained under the total allowed, which OP proposes to be 3400 spaces. The ANC and public would have no role until the maximum number of spaces was exhausted and a developer sought a special exception to create more. A similar developer driven parking proposal was promoted early in ZRR by OP and was rejected by the public and the Zoning Commission. It should not be resuscitated here.

The Committee of 100 urges the Zoning Commission to require the use of traditional zones with traditional development standards that are compatible with the existing surrounding neighborhood, the preparation of meaningful elevation exhibits, a more responsible and creditable affordable housing percentage, and the insertion of the SAP parking formulas.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Nancy J. MacWood".

Nancy J. MacWood, Chair