

ZC 14-22**Response to "Supplemental Report for Proposed Text and Map Amendment,
Create New Zoning for the District's Portion of the Former Walter Reed Campus"**

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Dear Chair Hood and Members of the Commission:

Please consider these comments as you finalize the zoning regulations for the redevelopment of the former Walter Reed site.

Community Input Curtailed

There are virtually no Planned Unit Development (PUD) provisions in the proposal, thereby effectively eliminating community input over building design, public amenities and recreation facilities, massing, and height.

The Walter Reed Community Advisory Committee is a welcome opportunity for community engagement, but is not a viable replacement for the meaningful participation that the PUD process provides.

We need to ensure that the community is not shut out from formally participating as the project develops and as community needs evolve over the decades. PUD provisions should be part of the zoning regulations, consistent with those in other zones.

Consistency with the Small Area Plan***Town Center***

We thank the Commission for asking that the Office of Planning (OP) clarify the proposal's consistency with the Small Area Plan (SAP). This was one of our chief concerns with the proposal, particularly with the height of the Town Center, now proposed for up to 85 feet.

Ms. Steingasser concludes that the proposal is consistent with the SAP, noting that the "SAP also includes specific recommendations for *certain building forms such as step backs, setbacks or tall ground floor heights* (emphasis added) as well as desired outcomes such as streetscapes activated by retail and maintenance of important green spaces."

We agree. The Small Area Plan has specific recommendations, drawings, and maps, including Exhibits 4-117, 118, 120 and 121. These show the Town Center site, including its elevation at different points of the building, the location of parking, retail, and residential floors and the height of the retail floor (15 feet) and the height of each of the five residential floors (10 feet per floor). The exhibits clearly show a building that totals 65 feet above existing grades.

During the April 2, 2015 public hearing members of the Zoning Commission said that SAPs often include drawings that provided only for illustrative purposes.

There is no language in the SAP notifying the public that Exhibits 4-117, 118, 120 and 121 are only illustrative or that they are to be considered differently than other exhibits in the SAP that are incorporated into the proposed zoning regulations

When we reviewed the draft SAP prior to voting in support of the SAP as Advisory Neighborhood Commissioners (4B01 and 4B02) we relied on Exhibits 4-117, 118, 120, and 121. We believe that others did as well.

Site Plans for Potential Rowhouse Layouts

To be consistent with homes and quality of life in the community around the Walter Reed campus, we urge that a rear yard be provided behind the townhomes proposed on the south side of Fern Street and the north side of Elder Street within the Walter Reed campus. Regarding the provision of a garage behind these homes, a parking pad could suffice instead of a garage.

Also, we support the recommendation of ANC 4A that would provide space between sections of townhome strings to allow for circulation of air and light.

Affordable Housing

Walter Reed gives the city a unique opportunity to provide a significant number of affordable units. The city controls the land and is writing new zoning language for the project. Therefore, our city's critical public policy goal of increasing affordable housing should be incorporated into the zoning language .

OP has explained that requiring higher levels of affordable housing over the standard citywide zoning requirements is unnecessary because the public will be protected by the city's Land Disposition Agreement (LDA) with the developer.

OP is also proposing a minimum of 432 total affordable units, but not all would be permanent . However, it is not clear how many of these units are being provided as part of the site's NOI requirements and will be financed through existing grants and taxpayer-funded programs and how many are actually being provided by the developer.

We urge the Commission to require that at least 30 percent of the total number of housing units at Walter Reed be affordable for the life of all of the units, as some Councilmembers proposed in earlier drafts of Public Law 20-0193 (the Disposition of District Land for Affordable Housing Amendment Act of 2014). We also urge that at least 8% be allocated for permanent affordable housing in each zone.

Given the urgent need in this city for more affordable housing and the related, costly issues arising from a dire lack of same, it is critical that we take advantage of the opportunity presented to us to provide significantly more than the paltry 8% referred to in OP's July 17, 2015 Supplemental Report.

We also urge the Commission to wait to adopt the regulations until the details of the agreements in the LDA are available to the public.

Thank you for your consideration.