

COMMENT IN RESPONSE TO OP'S SUPPLEMENTAL REPORT IN CASE 25-09

Dear Chairman Hood and Members of the Zoning Commission,

I am a member of ANC 3C, the area impacted by the proposed zoning map amendment of Connecticut Avenue, N.W. in Cleveland Park and the subject of Case 25-09. (Please note that I submit this comment in response to the Office of Planning's Supplemental Report solely in my capacity as commissioner for SMD 3C-08 and not on behalf of the ANC 3C as a whole.) I have resided in Washington DC for decades and in the Cleveland Park Historic District for 26 years. During this time I have been engaged and testified in a number of planning, zoning and historic preservation matters as a citizen, community organization leader, and ANC commissioner.

OP Fails to Justify Why Setbacks Should Not Be Required Here When They Have Been Included in Other Zones.

OP has failed to explain why setbacks and other transition tools should not be incorporated into the proposed zoning in this case when it has included these requirements in numerous other zones and contexts in the District, including on Connecticut Avenue in Chevy Chase DC. The omission is fundamentally inconsistent with prior zoning and particularly glaring in this location, an historic commercial strip of low rise commercial structures proposed for a 500% increase in density and substantial height increase and surrounded by lower scale and density residential contributing structures in the Cleveland Park Historic District. OP's logically tortured submission fails to justify the departure from what is often standard. The Commission should require that setbacks and transition tools be included in the proposed zone and that new construction in the historic commercial area within the zone be subject to design review by the Historic Preservation Review Board.

OP Fails to Justify Why the Proposed Zoning Should be MU-8. The Commission Should Apply MU-5.

The landmarked and contributing structures along Connecticut Avenue, the history of this commercial strip, and the permanent visual impact of extreme height differentials (potentially 75 feet plus a habitable penthouse on top of one and two story historic commercial structures) all deserve more weight than they appear to have received. There are other zone classifications consistent with the Comprehensive Plan and Plan policies (including in the Historic Preservation element) that require consideration and warrant the Commission choosing MU-5 instead of proposed MU-8, a zone without precedent in any other historic district of lower-scale landmarked and contributing structures.

OP's Refusal to Extend the IZ+ Scale Here to Match the Significant Proposed Increase in Height and Density Leaves Affordable Housing on the Table and Creates a Damaging Precedent for Future Development in Ward 3.

OP's refusal to lineally extend IZ+ requirements to the unprecedented 125% increase in density in the proposed map amendment is baffling when it has continued to cite affordable housing to justify the proposed extreme change in permitted height and density in a low rise historic district. OP's arguments against doing so are make-weight and defy logic. Its position would leave significant potential affordable housing on the table and transfer an additional windfall to commercial developers rather than advancing the District's affordable housing goals. The Commission should correct OP's mistake and take this opportunity to adjust the current IZ+ scale that tops out below 125% and require additional affordable housing at deeper affordability levels in exchange for an unprecedented increase in matter-of-right density.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "Rick Nash". The signature is stylized and cursive.

Rick Nash
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