

SUBJECT: ADVISORY NEIGHBORHOOD COMMISSION 3C
LARGE TRACT REVIEW COMMENTS

PROJECT: 2631-2641 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20008

DEVELOPER: TWENTY-SIX THIRTY-ONE L.T.D., PARTNERSHIP

SUMMARY STATEMENT

The Advisory Neighborhood Commission 3C ("ANC 3C") has carefully considered the subject proposal and appreciates the opportunity to have its opinions considered and given great weight in the Large Tract Review process pursuant to Section 1500.2 of Title 10 DCMR, Chapter 15, which provides that 'The goals of these rules are to minimize adverse environmental, traffic and neighborhood impacts...'

Careful consideration has included reviewing the submission in light of the merits of the submission itself; both District and Federal Elements of the Comprehensive Plan the National Capital District Elements ("the Comprehensive Plan"); detailed presentation by the Developer and his representatives; prior Office of Planning interpretation of the Comprehensive Plan commercial density language in zoning terms; community comment obtained at a special ANC 3C Meeting held September 16, 1987 which included a presentation by the Developer; and community and other relevant comment represented in such ways as prior correspondence to the Government of the District of Columbia.

Our comments are made without prejudice to the Developer and to the architectural merits of the proposed structure, if considered not in the context of the site in question. We wish to thank the Developer for his continued willingness to meet with the community to describe his proposed project, and to thank his representatives for the thoroughness with which they described the proposed project and provided further clarification and explanation. We wish to thank the Office of Planning, Mr. Fred Greene and his staff, for their continued interest in ensuring that the Developer and the community have opportunities to present their concerns and work towards a mutually advantageous solution that will benefit the District of Columbia, commercial and residential site development and preservation of a stable, existing neighborhood.

ANC 3C maintains that the proposed development is inappropriate and that the Large Tract Review process will

determine that the proposed development will adversely affect the Woodley Park neighborhood, traffic and environment. The proposed development violates the Comprehensive Plan in terms of its goals, policies, and objectives. Further, the present C-2-B zoning for Square 2204 is inconsistent with the Comprehensive Plan and has been the subject of such actions as a request to the Zoning Commission for emergency downzoning. Additionally, we will seek to show that the Large Tract Review filing is inadequate and misleading. We will provide comment concerning such issues as intolerable transportation impact; inappropriate urban design including building mass, scale, materials and use; deleterious effect on neighborhood businesses; and direct and untenable impact on a stable neighborhood, its environment and quality of life.

THE PROPOSED DEVELOPMENT - A THUMBNAIL SKETCH

The proposed development is situated on Square 2204, presently zoned C-2-B, and will require no zoning variances. The proposed building will occupy a land area of 16,560 feet, have an FAR of 2.0 residential and 1.5 commercial, and a building height of 65 feet with an additional 16.5 foot mechanical roof. The building will contain a ground floor of commercial space, a second floor of offices, and four floors of condominium apartments. 51 underground parking places are included; 32 are designated for residential users and 19 for office and retail staff. No public parking will be provided. The proposed development will displace a public parking lot with an estimated 100 spaces. Parking access to the proposed building, and commercial deliveries and trash pickup, will occur through an existing rear alley that is 15 feet wide at its longest axis and approximately 10 feet wide at its shortest axis.

INCONSISTENCY WITH THE COMPREHENSIVE PLAN

The first Major Theme in the Comprehensive Plan states:

1. Stabilizing the District's Neighborhoods.

The successful and creative functioning of neighborhoods is a fundamental concern....The District elements of the Plan propose that the residential character of neighborhoods be maintained and improved...Ensuring good quality neighborhoods is of utmost importance to the District.

Further, the site for the proposed development is classified as a "local neighborhood commercial center" which the Comprehensive Plan defines as 'a center dependent on customers who live or work within walking distance. These

centers are likely to have a small food store or drug store, with sales of daily groceries, sundries, convenience items and personal services. Usually, there is little or no office space or parking.' The Office of Planning has previously published its interpretation of the Comprehensive Plan's commercial density language. In the Wisconsin Avenue Corridor Study, September 1986, p. 10, the Office of Planning interprets "low density" as either C-1 or C-2-A.

For these reasons, ANC 3C, the Woodley Park Community Association, and certain petitioners filed, prior to the Developer's filing under Large Tract Review, a request with the Zoning Commission for an emergency downzoning to C-2-A of Square 2204, which includes this site.

ARGUMENTS IN SUPPORT OF DOWNZONING SQUARE 2204 TO C-2-A

ANC 3C and the Woodley Park community position has and continues to be that C-2-B zoning is totally inappropriate for Square 2204 and that downzoning to at least C-2-A is supported by the following factors:

1. Consistency with the Comprehensive Plan. The commercial area of Square 2204 is designated a "local neighborhood commercial center" and must be maintained at the lowest density of commercial use under the Comprehensive Plan. Indeed, the District of Columbia Generalized Land Use Map defines both sides of the 2600 block of Connecticut Avenue as "low density commercial." The west side of this area is zoned C-2-A, while the east side is C-2-B. Not only is this internally inconsistent, but the C-2-B zoning is clearly and without question in conflict with the Comprehensive Plan.
2. Compatibility with height, density and existing uses. Present commercial structures in Square 2204 are in keeping with the rezoning request, with the possible exception of one structure which may marginally exceed the permissible lot occupancy. Related concerns include: difficult and potentially dangerous traffic conditions; matter-of-right uses, such as fast-food establishments which could exacerbate existing problems of traffic, trash and parking; and the fact that C-2-A, not C-2-B, zoning permits the neighborhood-based commercial uses designed to serve "low and medium density residential areas" that is precisely the character of this Woodley Park residential neighborhood.
3. Logical accordance with surrounding commercial zoning. The character of the existing commercial establishments comport with the requested C-2-A rezoning. Further, Square 2204 lacks important characteristics which are available at other sites along Connecticut Avenue zoned C-2-B, such as buffer zones, which serve to separate residential and

commercial districts. For example, the Van Ness area which has these buffers --unlike Woodley Park-- is zoned C-2-B.

4. The Federal Interest - Lessening of negative impact on Rock Creek Park and Taft and Ellington Bridges. Rezoning to accomplish lower height limits and less density would be supportive of the aims of the Commission of Fine Arts, and would further be consistent with and sensitive to measures to protect the historical value of the nearby landmark bridges.

Additionally, the position on downzoning to C-2-A at this site has been supported to the District of Columbia Government by the following: Councilmember Frank Smith, Councilmember Betty Ann Kane, the Ward One Council, the Woodley Park Community Association, ANC 3C, and in community advice to the Citizen's Advisory Council (CAC) to the Ward 3 Plan and to the Connecticut Avenue Corridor Study committee.

We would further point out that the Honorable Mayor Barry established the Connecticut Avenue Corridor Study committee subsequent to the direct request of an ANC 3C Commissioner, pointing out the specific problems with Square 2204 zoning. This Commissioner proposed the study as an appropriate vehicle to deal expeditiously with the inconsistent zoning of Square 2204, as well as other sites along Connecticut Avenue, and to provide opportunity for community --residential and commercial-- interests to be fully heard. On October 31, 1986, Mayor Barry issued a press release stating that he had instructed his Planning Director to initiate new downzoning cases in several areas including the Connecticut Avenue/Cleveland Park commercial districts.

LARGE TRACT REVIEW FILING -- INADEQUATE AND MISLEADING

Business Displacement/ Parking Inadequacies

The subject filing indicates that no businesses will be displaced and that the site is presently a vacant lot. However, the site is presently occupied by a public parking lot which serves an estimated 100 cars, and the proposed development will not provide parking for the public. The parking problems in the Woodley Park Community are well known to the District of Columbia Government from which the Woodley Park Community has sought additional enforcement resources.

Parking violations are already extreme. Frustrated drivers often find the two hotel lots and the existing lot at the site filled. They park in neighborhood private driverways, block handicapped sidewalk accesses, and block alleys -- a dangerous situation in times of needed police

car, fire truck or ambulance access. We will discuss these problems more fully later in our comments under 'Transportation Element'.

Urban Design Inconsistencies

The subject filing states that the proposed development will reinforce the existing urban design. To the contrary, the proposed development is approximately twice the height of the tallest adjacent structure, is designed with a metal roof inconsistent with roof materials used adjacent buildings, and is approximately four times as wide as adjacent structures -- a mass that is inconsistent with the existing urban design.

Vehicular Trip Generation and Traffic Analysis Inadequacies

The Vehicular Trip Generation and Traffic Analysis provided in the subject filing provides questionable figures and an inadequate analysis. For example, no mention is made of the public parking lot which will be lost, and the impact of this on the community.

Further, office space is expected to house 36 workers and only 12 are expected to drive. No mention is made of automobile trips which public users of these office services will make. Likewise, although the commercial space is expected to house a restaurant as well as at least 3 other businesses, only 5 workers are expected to drive. No mention is made of where customers of these businesses will park, nor the effect on the community of this additional burden.

Similarly, of the 64 condominium residents, only 15 are expected to make one roundtrip daily in their cars -- and this estimate is made only on their travel to work. Even if one accepts this optimistic estimate, no consideration has been given to the many after work hour trips and weekend automobile use, nor has mention been made of the effect on neighborhood parking of those residents with automobiles not fortunate enough to have access to one of the 32 allotted building parking spaces for an estimated 64 residents.

Even at the present construction density, there are serious operational problems in the alley behind the site. Service and delivery vehicles frequently block passage entirely, or may have difficulty negotiating the right angle turn into the 10 foot wide axis of the alley at its south end. Large trucks, such as moving vans, will not be able to make this turn at all and will need to back up the entire length of the alley.

We contend that the Vehicular Trip Generation and Traffic Analysis provided for consideration under the Large

Tract Review process is not only misleading, but inadequate, and recommend to the Office of Planning that a thorough analysis be provided before proceeding with consideration of any development at this site under the Large Tract Review process.

Schematics Misleading

The schematics provided in the subject filing extend beyond the block in questions, but only in one direction advantageous to the filer. The schematics show a building in the next block which is approximately the same height as that proposed. However, not only is this building not on the same square, it is a completely residential apartment building and its square is zoned as such. Such comparisons of the proposed development, which is one third office and commercial space, and which is located on a square with commercial zoning, to a completely residential building on a square zoned for residential use only, is, at best, misleading.

If the schematics had shown the buildings to the rear of the structure, they would have shown a row of residential townhouses, zoned as residential.

Finally, if extending the schematics was seen as desirable, extending them to the south would have shown low density, low height commercial structures, surrounded by a fairly large garden, with a rear parking lot for workers and customers, --and which backs on to Rock Creek Park. Likewise, if the schematics had shown the commercial structures facing the proposed development --those on the east side of Connecticut Avenue-- one would see a row of even less high, primarily townhouse structures on a block already zoned C-2-A.

WOODLEY PARK COMMUNITY CONTRIBUTION TO ECONOMIC DEVELOPMENT

The contribution that the Woodley Park community already makes to the economic development of the District of Columbia must be taken into account. Two very large hotels, providing a substantial portion of the District's tax base, already exist in the community. Their existence is a nonconforming use and classified by the District as such.

Woodley Park also is home to one of the District's primary tourist attractions, the National Zoological Park ("the Zoo"). Loved and appreciated by community residents, it also fierce parking competition and very heavy vehicular and metro traffic. On peak weekends, over 25,000 visitors use the Woodley Park Metro station for transportation to the Zoo.

Additionally, the Woodley Park Metro station is well used, not only by residents, but by non-residents seeking to use various business establishments, and particularly by hotel guests. We maintain that use of this Metro station is already substantial and contributes fully to the economic development of the District.

ECONOMIC DEVELOPMENT PLAN ELEMENT COMMENT

The subject proposal maintains that economic growth will be promoted through job creation, the development of under-used commercially zoned land, and the generation of increased revenue.

We concur with this analysis, but point out that any development on this site, including development consistent with the lower commercial zoning requested, will fulfill these same criteria and in a way consistent with the Comprehensive Plan and with preserving a stable and viable neighborhood. Further, Woodley Park already contributes a substantial tax base, as well as a vast number of jobs, through the nonconforming use hotels with more than 2,000 rooms.

Woodley Park has a track record of supporting economic development --but economic development consistent with preserving the stable, existing commercial and residential neighborhood. The Woodley Park Community Association has a long-standing Business Development Committee which has undertaken various projects in the community. These have included a project, supported by the Zoo and local businesses, to beautify an area directly across from the Zoo and provide seating space for the community and visitors.

This summer, areas adjacent to Rock Creek Park as well as neighborhood alleys were cleared of refuse and generally cleaned with support from residents, businesses, the District and the National Park Service. Other efforts have resulted in added trash receptacles along Connecticut Avenue, and in cooperation with the District Government, the repair of dangerously deteriorating sidewalks, and the removal of diseased elm trees and tree branches. Indeed, this Committee worked directly with the former owners of the site now in question and the current developer to try to ensure, in advance of its sale, that development would be appropriate.

We wish to point out that we have already seen the displacement of one small business on the 2600 block of Connecticut Avenue due to a non-economically viable increased rent and a month-to-month lease offered, so we understand, to permit the building owner to have his site available for sale. We also have seen sale signs on other buildings in this block. Clearly, additional development

beyond that in the subject proposal will occur, and will occur under the current matter-of-right zoning unless that is forestalled.

The community does not object to, indeed strongly supports, economic development in keeping with the Comprehensive Plan and preservation of the stable and existing commercial and residential neighborhood.

HOUSING PLAN ELEMENT COMMENT

The Comprehensive Plan speaks to the District's obligation to facilitate the availability of adequate, affordable housing, and notes that of particular importance are policies that support homeownership among moderate-income households, assistance to elderly homeowners and to families headed by women. The proposed development will provide 32 condominiums at prices estimated by the Developer to be \$100,000 to \$200,000. For many in the District, these would be considered unaffordable. In any case, this is neither low nor moderate priced housing.

But the community does not argue that additional housing is appropriate for this site, and further notes that the available C-2-B zoning permits an FAR of 3.5 residential (the proposed development requests a 2.0 FAR for residential use) and further notes that, under the requested C-2-A zoning, a residential FAR of 2.5 is permitted -- which exceeds that requested in the proposed development.

ENVIRONMENTAL PROTECTION PLAN ELEMENT COMMENT

The subject proposal maintains that goals for Environmental Protection will be met by meeting code requirements for sanitation, etc., and by development of a site that will maximize the use of mass transit, thereby saving energy.

The Comprehensive Plan, as its first major policy statement concerning Environmental Protection states:

'Environmental concerns encompass the protection of the natural environment and the regulation of the human environment in ways that maintain and enhance the quality of life and the sense of well-being of the occupants of the District.' (emphasis added) Clearly, the Comprehensive Plan requires the consideration of factors beyond sanitation control and saving energy, important as they are to all of us.

What did the community say about the effect of the proposed structure on quality of life? We received no

comments that it would be enhanced, or even maintained. Residents spoke to the increased noise from commercial establishments being serviced by early morning trash pickup and product deliveries. Residents spoke of the impact on the neighborhood of increased traffic and objected to the proposed development not adequately addressing this. Residents spoke of the proposed development's plan to use the alleyway as exacerbating an already intolerable situation and described how the alley does not permit trucks to turn around or back up, how they are kept waiting while trucks finish their business, how trucks have damaged their garden fences.

Residents objected to a large structure looming over them. Indeed, it appears that the proposed structure will be seen, not only from the rear of the back facing residential townhouses, but by pedestrians on Woodley Place as well as residents of the apartment building and townhouses on the eastern side of Woodley Place. It appears that the proposed structure, totaling over 80 feet in height, will obstruct sun and sky. As one resident described it, "It's the beginning of the end of the Woodley Park neighborhood." We concur. If the proposed development is permitted, the quality of life will deteriorate and it will continue to deteriorate as other developers seek to build similar buildings on adjacent parcels of land.

TRANSPORTATION PLAN ELEMENT COMMENT

The subject proposal maintains it contributes directly to the transportation goals by developing a site convenient to Metro, providing adequate parking to prevent use of residential streets by commercial users, providing off-street loading, and widening the existing 15 foot wide alley to 30 feet (in actuality, the design adds a 15 foot wide "pull-off" behind the proposed development to the existing alley) will ensure easy access for all users.

We concur that persons living, working, or using a site near to Metro will use it; indeed, it is apparent that persons not living, working or using a site convenient to Metro use it through planned connector buses, Metro parking lots at suburban Metro sites, and "Kiss and Ride" facilities. However, it has been shown that absolute additions to Metro use, accompanied by absolute additions to the volume of automobile commuters, will worsen the existing traffic congestion, and is therefore contrary to the transportation element of the Comprehensive Plan.

We further concur that adding a 15 foot "pull-off" to the alley to permit trucks to park the main alley is advantageous. However, we point out that this "pull-off" will only permit a certain number of commercial vehicles to

use this space at a single time, and figures have not been given to show that all commercial vehicles serving the proposed site can be accommodated on this additional 15 foot space. From our experience, most commercial trash pickup occurs early in the morning, and many commercial deliveries occur at that time as well, so use can be expected to be concentrated and the proposed "pull-off" inadequate to serve the increased traffic generated by the proposed development.

Earlier in our comments (Large Tract Review Filing -- Inadequate and Misleading, sections on Business Displacement/Parking Inadequacies and Vehicular Trip Generation and Traffic Analysis Inadequacies) we have addressed the problems of parking that this site will generate. In brief summary, the proposed site will displace a public parking lot and provide no parking for resident guests or commercial/office users; provide inadequate parking, we believe, for residents and commercial/office workers; require garage access and egress through an already overcrowded alley; encourage, through its lack of planning for additional parking needs generated by the development, traffic seeking parking to circle residential streets; and exacerbate the current parking problems in Woodley Park that are well known to the District of Columbia Government. We are especially concerned that ambulances, fire trucks and police vehicles have full and ready access to our neighborhood.

The Comprehensive Plan states that its policy is to encourage adequate short-term, on- and off-street parking to meet the needs of increased retail development at designated locations; and to establish traffic management strategies to separate local traffic from through-traffic within residential neighborhoods, route through-traffic around identified neighborhood enclaves if possible...

We would encourage studies of how through-traffic can be routed around identified neighborhood enclaves, and note that a number of community residents on Woodley Place have special concerns on this matter, as it seems apparent that drivers seeking parking for the proposed structure will circle the 2600 blocks of Connecticut Avenue and Woodley Place. Suggestions from the community have included analyzing the effect of prohibiting such circling traffic by erecting barriers similar to those in residential neighborhoods near Mazza Galleria. We understand that the Woodley Park Community Association is studying such a proposal and may request District Government assistance in the analysis.

We have noted the inadequacies in the Large Tract Review subject proposal, and stand ready to consider any additional information on the Transportation Element that the Developer is required to submit. We look forward to

additional District Government comment on this Element, in particular. We urgently request that the Office of Planning ask for a traffic impact analysis from the Department of Public Works before proceeding with any development decisions affecting Square 2204.

PUBLIC FACILITIES PLAN ELEMENT COMMENT

We would only note that, as the subject proposal maintains that additional tax base will accrue from the proposed development, that the additional residential and commercial users will also draw on District of Columbia resources for public facilities such as sewage disposal, public schools, police and fire fighting resources.

URBAN DESIGN PLAN ELEMENT AND PRESERVATION AND HISTORIC FEATURES PLAN ELEMENT COMMENT

The subject proposal maintains that it contributes to urban design goals by a distinctive design that reinforces the existing architectural character of the Woodley Park area, responds through set backs and massing to the existing scale, and creates a project of architectural merit. The subject proposal maintains that its design responds to the historical character of its immediate context and the general architectural character of the Connecticut Avenue corridor, and notes that it is not now in a historical district.

The Comprehensive Plan has as a major policy of its Urban Design Element that:

Future development must be carefully controlled to protect and enhance the neighborhoods, natural open spaces, and national and international image qualities.

And further, that the Preservation and Historic Features Goal is: '...is to preserve the important historic features of the District while permitting new development that is compatible with those features.'

The proposed development is inconsistent with the scale, mass, certain materials and density of Woodley Park, a neighborhood of historic significance which the District Government has already recognized as having merit by providing a generous grant to enable Woodley Park to conduct the necessary research to permit a filing for a designation as a Historic District. Indeed, certain buildings in Woodley Park already carry Historic Landmark Designation.

We will relate our comments on these elements to community advisories and to a publication prepared for the Planning and Zoning Commission, Salt Lake City, Utah, by the Utah State Historical Society, an architectural historian, and Wallace N. Cooper 2, Architects and Associates, dated December 1979 and entitled: "Historic District Design Guidelines." (All quoted items which follow are from this document.)

HEIGHT: 'Avoid new construction which greatly varies in height (too high or too low) from older buildings in the vicinity.'

The proposed structure, at over 80 feet in height, is about twice as high as the highest adjacent structure, and higher than any building on the block. The proposed structure is two to three times as high as structures facing it across Connecticut Avenue. And it is nearly twice as high as the residential townhouses behind it.

SCALE: 'Avoid buildings which in height, width or massing violate the existing scale of the area.'

The proposed structure is much higher than adjacent and facing structures, is approximately four times as wide as adjacent structures, and is designed as a single, large and wide structure, on a block known for its lower, narrower and townhouse facade structures. Its design, regardless of its merits considered alone and outside of this site, is inappropriate in height, width and mass with adjacent structures. Indeed, the most recent structure on that site was a townhouse for which ANC 3C and the Woodley Park Community Association were able to delay destruction until the property owner agreed to work in partnership with the community to try to reach agreement for appropriate development on that site.

MASSING: 'Avoid single, monolithic forms which are not relieved by variations in massing. Boxlike facades and forms are intrusive when placed in a streetscape of older buildings which have varied massing and facade articulation.'

The present structures on Square 2204 are primarily townhouses which were once totally residential, with varied massing and facade articulation. Although the proposed structure carries the spirit of many individual design elements found on adjacent structures, its facade is clearly that of a large, single structure.

The Developer will use a brick consistent with that found in the Woodley Park Community, and will substitute a stone-like material for the limestone found on many adjacent buildings. The roof is sloped, and appears to be an

approximate representation of the mansard roofs found on adjacent buildings, but the sloped roof will be covered with metal material, unlike the slate of nearby roofs built at a time when such modern materials did not exist. We understand that economic constraints sometimes dictate that desirable materials cannot be used, but we point out this discrepancy as yet one additional feature to document how the building does not, as the subject proposal maintains, respond to the historical character of its immediate context.

We concur with the community member at the September 16, 1987 meeting who said:

"This is a wonderful building, but it's in the wrong place."

CONCLUSION

For the reasons provided addressing inconsistencies with the Comprehensive Plan, inadequacies and misleading submission by the Developer of the Large Tract Review proposal, documented disagreements with the Large Tract Review proposal, and the deleterious effect on a stable commercial and residential neighborhood, ANC 3C respectfully recommends to the Office of Planning that:

1. That the Office of Planning support all efforts to effect needed changes in zoning regarding the 2600 block of Connecticut Avenue (as well as the south side of Square 2204) to bring it in to conformity with the Comprehensive Plan and the District of Columbia Generalized Land Use Map;
2. The subject proposal for Large Tract Review be denied;
3. That the Office of Planning request that the Department of Public Works complete a traffic impact analysis, with particular attention directed to any additional use of the alley between Woodley Place and the 2600 block of Connecticut Avenue, as well as the use of barriers on the 2600 Woodley Place to limit the use of that residential block by increased traffic prior to proceeding with any development decisions affecting Square 2204; and
4. That the Office of Planning require the developer to submit a thorough and adequate Vehicular Trip Generation and Traffic Analysis prior to any future consideration of any proposed development at this site under the Large Tract Review process.

RELEVANT DEFINITIONS
FROM THE
COMPREHENSIVE PLAN ACT OF 1984 (D.C. LAW 5-76)

Section 1107. Commercial Land Use Categories.

(a)(1) The low density commercial land use category includes shopping and service areas that are generally low in scale, character, and activity and that provide a limited or specialized range of retail goods and services as the predominant uses.

Section 1108. Commercial Center Classifications

(a) A hierarchy of commercial center classifications based on primary function is established: local neighborhood center, multi-neighborhood center, regional center and the Central Employment Area. These classifications are generally depicted on Map 3.

(b)(1) Local neighborhood centers supply sales of daily groceries, sundries, convenience goods and personal services to neighborhood residents and workers. There is limited parking. Motorists are likely to go to larger concentrations of stores where parking and a greater selection of goods and services are more readily available. A small food and sundries store selling convenience items is usually a principal element of a local neighborhood center. Service stores such as gas stations, carryouts, barber shops, cleaners, diners, and bars also locate in local neighborhood centers. There is limited office space. Local neighborhood centers may be further subclassified to identify new centers to be established and existing centers to be upgraded.

Woodley Park Community Association
2929 Cathedral Avenue, Northwest
Washington, D.C. 20008

— EXHIBIT 5

January 7, 1988

Mr. Lindsley Williams, Chairman
D.C. Zoning Commission
District Building
1350 Pennsylvania Avenue, N.W.
Room 11
Washington, D.C. 20004

RE: Z.C. Case No. 86-26
Connecticut Avenue (Woodley Park)

PRE-HEARING EXPANDED SUBMISSION

Dear Chairman Williams and Members of the Commission:

As Board Member and Chairman, Economic Development Committee, Woodley Park Community Association (WPCA), I am transmitting a further description of WPCA's testimony regarding Z.C. Case No. 86-26. The WPCA appreciates that its testimony will be presented subsequent to that presented by the Cleveland Park Historical Society (CPHS) to prevent repetition of testimony. The CPHS testimony includes presentationst that will be given on behalf of both WPCA and CPHS, and these will address common concerns, such as transportation and traffic. We further note that the Woodley Park Overlay Zone affects two Squares in Ward 1 and one Square in Ward 3.

I. List of Witnesses, Testimony Topic, Time Estimate

Dr. Cheryl Opacinch	Introduction/Issue Overview	8 min.
Mr. Brian Jones	Woodley Park - Pictorial	8 min.
Dr. Charles G. Field, Esq. and Dr. Cynthia R. Field	Historical Concerns	7 min.
Mr. Fred Pitts	Development Scenarios (Graphics)	5 min.
Mr. Charles Warr	Transportation and Traffic Concerns	7 min.
Ms. Ellen Burton	Residential Concerns	5 min.
Ms. Zina Green	Commercial Concerns	5 min.
Mr. Larry Aurbach, Esq. and Ms. Lee Grey	Federal Interest Concerns and Historic Scale	5 min.
ANC 3C Representative	ANC 3C Testimony	5 min.
WPCA Board Member	Summary and Conclusions on WP Overlay Zone	5 min.

Charles Warr, President
Howard Friedman, Vice President
Carol Chamberlain, Secretary
Charles Lupton, Treasurer

- II. Outline of Testimony - Major Points (Attached)
- III. Information, Reports and Other Materials to be Introduced at the Hearing (Partial Listing)
 - A. Pictorial Display of Selected Woodley Park Locations
 - B. Materials Related to the Historical Significance of Woodley Park Structures and the Community
 - C. Charts and Graphs of Current and Potential Development under Various Assumptions
 - D. Residential Concerns - Materials and Photographs
 - E. Materials Related to the Federal Interest
 - F. Preserving and Stabilizing Existing Neighborhoods - The Woodley Park Overlay Zone
 - G. Listing of Experts
 - H. Textual Changes to the Woodley Park Overlay Zone (Proposed)

If additional information or clarification of this submission would be useful, please contact me at 232-4338. Thank you for your consideration.

Respectfully Submitted,

WOODLEY PARK COMMUNITY ASSOCIATION

By: Cheryl Ann Opacinch / gl
Cheryl Ann Opacinch

Attachment

DR. CHERYL OPACINCH
Outline of Testimony before the D.C. Zoning Commission
Z.C. Case 86-26
Woodley Park Overlay Zone

INTRODUCTION AND ISSUE OVERVIEW
(8 minutes)

- I. Three Part Testimony
 - A. WP Overview
 - B. WP Overlay Zone
 - 1. Support OP's WP Overlay Zone (Concurrence)
 - 2. Additions to WP Overlay Zone (Additions)
 - C. WP Testimony -- Organization
- II. WP Overview
 - A. Thank you re: testimony opportunity
 - B. WP -- a historically active community (WP Plan)
 - C. Connecticut Avenue Corridor Study -- a WP request
 - D. The Squares in question
 - E. Major concerns
 - 1. Preserving and stabilizing existing neighborhoods
 - 2. Comprehensive Plan consistency
 - 3. Traffic and parking; alley constraints/problems
 - 4. Metro and commercial use now; neighborhood heavily commercial; Metro heavily used; impact of zoo and two major hotels that are nonconforming uses in a residential zone
 - 5. Encroachment of commercial zone on a residential street (2610 and 2612 Woodley Place)
- III. WP Overlay Zone (Concurrence)
 - A. Mandatory retail use on ground floor
 - B. Prohibition on Connecticut Avenue curb cuts
 - C. BZA approval required for restaurants/bars after a set limit
 - D. Height limits
 - E. Prohibition on fast food restaurants (Square 2204)
 - F. Prohibitions on hotel use (new; Square 2204)
- IV. WP Overlay Zone (Additions)
 - A. Height limitations and differentials
 - B. Prohibition on transient housing
 - C. Commercial use limitations
 - D. Setbacks: Square 2204 -- 20 feet from alley with mandatory paved 10 foot pulloff unencumbered by walls; Square 2202 -- set back to preserve view of bridge
 - E. Strengthening of burden of proof requirements for exceptions by applicants
 - F. Prohibition on PUD's (which violate and defeat the purposes of an overlay zone)
 - 1. Problems
 - 2. Height/density limits
 - 3. Correct C-2-B zoning

- V. WP Testimony -- Organization
 - A. General outline for topics (what WP looks like, residential concerns, historical considerations, etc.)
 - B. WP testimony supports the proposed WP Overlay Zone and 6 additions; and supports a need to change zoning to residential from commercial on two WP townhouses.

MR. BRIAN JONES

Outline of Testimony before the D.C. Zoning Commission

Z.C. Case No. 86-26

Woodley Park Overlay Zone

WOODLEY PARK - PICTORIAL SLIDE PRESENTATION

(8 Minutes)

- I. Need for Woodley Park Overlay Zone to preserve aesthetics of this special street and to preserve the stabilization of an existing neighborhood.
- II. Support for height limitations, their relationship to present structures and consistency with Comprehensive Plan.
- III. Need for setbacks in Square 2202 to preserve views of bridge and ornamental/sculptural entrance.

DR. CHARLES G. FIELD and DR. CYNTHIA R. FIELD
Outline of Testimony before the D.C. Zoning Commission
Z.C. Case No. 86-26
Woodley Park Overlay Zone

CONNECTICUT AVENUE AND WOODLEY PARK: RELATED HISTORICAL CONCERNS
(7 Minutes)

- I. Woodley Park neighborhood has from its beginnings been viewed as an integrated unit of high density, in-town attached housing units served by commercial activities along Connecticut Avenue.
 - A. Original maps designate area as Woodley Park.
 - B. Unlike other outlying areas of Washington, D.C., at the turn of the century, Woodley Park was intended to be a residential community of primary residences whose owners worked in the downtown area.
 - C. Original buildings along Connecticut Avenue in the 2202, 2203, 2204 squares were residential, sharing the same architectural features as the townhouses built off of Connecticut Avenue.
 - D. Mass and size of buildings in the squares in question share the same general height features as townhouses elsewhere in the Woodley Park neighborhood.
- II. Overlay requirements would preserve the harmonious relationships between the residential fabric and commercial activities.
 - A. The height limitations would preserve the general relationships between the three-story townhouses and commercial buildings.
 - B. Land uses consistent with the types found in local neighborhood centers, as called for in the Comprehensive Plan, would reinforce the community's historic sense of relationship whereby residents utilize the commercial facilities along Connecticut Avenue.
 - C. Need provisions that would require some architectural/stylistic relationship between development within the overlay area and the adjacent areas of Woodley Park, thereby preserving the visual and integrated relationship between the commercial and residential areas.

MR. FRED PITTS

Outline of Testimony before the D.C. Zoning Commission

Z.C. Case No. 86-26

Woodley Park Overlay Zone

DEVELOPMENT SCENARIOS - GRAPHICS

(5 Minutes)

Woodley Park Commercial Areas - Visual Presentation

- I. Present commercial development in Woodley Park
- II. Support for WP Overlay height and related requirements
 - A. Graphics of present structural heights
 - B. Graphics of height permitted under present zoning
 - C. Graphics of proposed height limitations

DR. CHARLES WARR
Outline of Testimony before the D.C. Zoning Commission
Z.C. Case No. 86-26
Woodley Park Overlay Zone

TRANSPORTATION AND TRAFFIC CONCERNS
(7 Minutes)

I. Metrorail Use. The District receives an excellent return on its investment in the Woodley Park Metrorail station.

II. Pedestrian Issues. Lack of pedestrian underpasses present at most other Metrorail stations.

III. Special Traffic and Parking Problems associated with the two convention hotels and the National Zoo. Peak day zoo attendance of 25,000 visitors in one day. Peak meeting attendance of 23,000 conventioners.

IV. Operational Problems associated with alleys. There are no alleys serving Squares 2202 and 2203. There are severe operational problems in the alley serving Square 2204.

V. Relationship between increased commercial density and "friction" effects. The slowing and turning traffic associated with local commercial uses effectively reduces the capacity of Connecticut and Calvert to accomodate through traffic.

MS. ELLEN BURTON

Outline of Testimony before the D.C. Zoning Commission

Z.C. Case No. 86-26

Woodley Park Overlay Zone

RESIDENTIAL CONCERNS

(5 Minutes)

- I. Woodley Park. The need to protect an established neighborhood as a desirable place to live, work and visit.
- II. The WP Overlay Zone and proposed additions concerning Square/2204.
 - A. Essential to preserve Woodley Park consistent with Comprehensive Plan goals.
 - B. Current severe alley constraints preclude increased usage -- problems of congestion, lack of adequate access by emergency vehicles, increased noise and trash, and safety matters.
 - C. Height limits support maintenance of residential quality of life
 - D. Commercial zoned properties (2610 and 2612 Woodley Place) on a residential street are in error and pose threats of residential street deterioration if developed, e.g., traffic congestion, noise, lack of privacy.
 - E. Need to preserve neighborhood-oriented services in commercial squares.
- III. The WP Overlay Zone and proposed additions concerning Squares/2202 and 2203.
 - A. Essential to preserve an existing, stable neighborhood.
 - B. Precludes intolerable expansion of existing problems, e.g., density, noise, increased traffic on residential streets, illegal and unsafe parking, decreased pedestrian safety.
- IV. Woodley Park can be a model urban residential-commercial neighborhood with the adoption of the WP Overlay Zone and the additions proposed by WPCA.

MS. ZINA GREEN

Outline of Testimony before the D.C. Zoning Commission

Z.C. Case No. 86-26

Woodley Park Overlay Zone

COMMERCIAL CONCERNS

(5 Minutes)

- I. Commercial zoning in excess of what "exists" is antithetical to the stability of a neighborhood.
 - A. Perspective from building owner (IBEX)
 - B. Perspective from business owner (Park Place)
 - C. Why Chevy Chase works
 - D. Why Woodley Park doesn't work
- II. City-wide economic development goals are hurt by commercial/office redevelopment west of the park
 - A. Positive economic impact of D.C.'s original zoning overlay-height limit
 - B. No controls on low-density office space -- intense pressures west of the Park siphon off economic development in three-fourths of city
 - C. City-wide overlay zoning for commercial use of development districts
- III. Conclusion: Overlay zoning sufficient to encourage rehabilitation and retention of existing structures will stabilize commercial area with positive impact on neighborhood and further true city-wide economic development

MR. LARRY AURBACH, ESQ. and MS. LEE GREY
Outline of Testimony before the D.C. Zoning Commission
Z.C. Case No. 86-26
Woodley Park Overlay Zone

FEDERAL INTEREST CONCERNS AND HISTORIC SCALE
(5 Minutes)

- I. The WP Overlay Zone and proposed additions are responsive to the needed scale concerns.
 - A. Area established during the first quarter of this century, approximately 1900-1930. The essential four-story townhouse character of the Woodley Park commercial area was established as well.
 - B. Because of the relationship between Woodley Park and Rock Creek Park, there is a federal interest in the scale of the Woodley Park commercial area, which borders and is visible from the Park.
 - C. Although Fine Arts Commission has mandatory review under the Shipstead-Luce Act, this occurs only when a proposal for construction is submitted.
 - D. Meanwhile, the Zoning Commission will establish density and height limitations.
- II. We urge the Zoning Commission to maintain the historic scale of the Woodley Park commercial areas by adopting the WP Overlay Zone and the proposed additions.

ANC 3C REPRESENTATIVE

Outline of Testimony before the D.C. Zoning Commission

Z.C. Case No. 86-26

Woodley Park Overlay Zone

ANC 3C COMMENTS

(5 Minutes)

- I. Development concerns in Woodley Park
 - A. Relationship to ward development
 - B. Need to maintain consistency with Comprehensive Plan
 - C. The WP Overlay Zone and the Comprehensive Plan designation of WP as a local neighborhood center as it relates to zoning
 - D. Need to preserve and stabilize existing neighborhoods through, in part, reasonable commercial development
 - E. Related concerns, e.g., traffic impact on residential neighborhoods, etc.
 - F. Prohibition on PUD's
- II. Support for WP Overlay Zone and proposed addition

WOODLEY PARK COMMUNITY ASSOCIATION BOARD MEMBER
Outline of Testimony before the D.C. Zoning Commission
Z.C. Case No. 86-26
Woodley Park Overlay Zone

SUMMARY AND CONCLUSION - THE WOODLEY PARK OVERLAY ZONE
(5 Minutes)

- I. Summary of major points to support WP Overlay Zone and proposed additions
- II. Expression of appreciation to Zoning Commission
- III. Formal transmittal of supporting documents
- IV. Transmittal of revised WP Overlay Zone language to include proposed additions

Woodley Park Community Association
2929 Cathedral Avenue, Northwest
Washington, D.C. 20008

EXHIBIT 6

November 30, 1987

Mr. Lindsley Williams, Chairman
D.C. Zoning Commission
District Building
1350 Pennsylvania Avenue, N.W. - Room 11
Washington, D.C. 20004

1987 DEC - 1 PM 1:59

Re: Z.C. Case No. 86-26
Connecticut Avenue (Woodley Park)

PRE-HEARING SUBMISSION

Dear Chairman Williams and Members of the Commission:

As Board Member and Chairman, Economic Development Committee, Woodley Park Community Association ("WPCA"), I am transmitting the WPCA request for testimony regarding Z.C. Case No. 86-26. The WPCA respectfully requests that its testimony be presented subsequent to that presented by the Cleveland Park Historical Society ("CPHS") to prevent repetition of common concerns. Further, the CPHS pre-hearing submission will request, on behalf of WPCA and CPHS, that certain presentations will be given on behalf of both WPCA and CPHS, that these will occur first, and that these will address common concerns including transportation and traffic, and Connecticut Avenue as a Special Street.

I. List of Witnesses, Testimony Topic, Time Estimate

Witness	Testimony Topic	Time Estimate
Dr. Cheryl Opacinch	Introduction/Issue Overview	10 minutes
Expert A	Woodley Park - Pictorial	5 minutes
Dr. Charles Field, Esq.	Connecticut Avenue and Woodley Park: Related Historical Concerns	15 minutes
Expert B and C	Development Scenarios - Graphics	10 minutes
Dr. Charles Warr	Transportation and Traffic Concerns	10 minutes
Experts D, E and F	Residential Concerns	10 minutes
Experts G and H	Commercial Concerns	10 minutes

Charles Warr, President
Howard Friedman, Vice President
Carol Chamberlain, Secretary
Charles Lupton, Treasurer

Con't

Witness	Testimony Topic	Time Estimate
Larry Aurbach, Esq. Expert I	Federal Interest Concerns	10 minutes
Peggy Robin, Chair ANC 3C	ANC 3C Testimony	10 minutes
Expert J	Preserving and Stabilizing Existing Neighborhoods - The Woodley Park Overlay Zone	10 minutes
Expert K	Summary and Conclusion	5 minutes
		<u>1 hour 45 minutes</u>

II. Information, Reports and Other Materials to be Introduced
at the Hearing (Partial Listing)

- A. Pictorial Display of Selected Woodley Park Locations
- B. Materials Related to the Historical Significance of Woodley
Park Structures and the Community
- C. Charts and Graphics of Current and Potential Development
under Various Assumptions
- D. Residential Concerns - Materials and Photographs
- E. Materials Related to the Federal Interest
- F. Preserving and Stabilizing Existing Neighborhoods -
The Woodley Park Overlay Zone
- G. Listing of Experts

If additional information or clarification of this submission
would be useful, please contact me at 232-4338. Thank you for
your consideration.

Respectfully submitted,

WOODLEY PARK COMMUNITY ASSOCIATION

By: Cheryl Ann Opacinch
Cheryl Ann Opacinch