

TESTIMONY OF ADVISORY NEIGHBORHOOD COMMISSION 3-C
Zoning Commission Case No. 86-26 (re. Woodley Park)
January 25, 1988

I am Phil Mendelson and I am here before you on behalf of Advisory Neighborhood Commission 3-C. As some of you may know, I do not live in Woodley Park -- I live in McLean Gardens several miles away -- but I am here because Woodley Park is an important part of our ANC community. ANC 3-C represents approximately 20,000 residents, in over 5 neighborhoods. We want to see the Woodley Park commercial center protected as a valuable feature of our Commission area.

Our position may not be identical to that of the other petitioners in this case. As with the others, we want to protect and maintain the existing character and quality of the Woodly Park commercial district. However, we believe that to do this the least restrictive zoning should be, at most, C-2-A, and that C-1 should be the predominant zone classification. In addition, we support an overlay zone -- along the lines advocated by the Woodley Park Community Association -- as the most sensitive mechanism to reflect and protect existing characteristics.

WARD DEVELOPMENT & CONFORMANCE TO COMPREHENSIVE PLAN

In the last several years, Ward 3 and the Woodley Park portion of Ward I have been subjected to tremendous pressure for commercial redevelopment. Examples include Friendship Heights, Tenley Circle, Wisconsin/Van Ness, Wisconsin near the Observatory, Connecticut/Van Ness (Soapstone, Intelsat, etc.), Park-'n-Shop, and 2637 Connecticut Avenue (Woodley Park). The reason for this, I believe, has been best explained in the September 1986 Regardie's magazine:

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The commercial development of uptown and midtown areas in Northwest Washington is creating a new office market. "The District now has the alternative market for people who still demand first-quality office space, but either do not want to pay or cannot afford the prices downtown," explains James Coakley, an assistant vice president at Leggat McCall/Grubb & Ellis. (p. 200)

The development of this alternative market is occurring at the expense of losing our neighborhood shopping areas. This is possible because the outdated 1958 zoning map remains unchanged in these critical areas.

These development pressures -- if unchecked -- are bad public policy because they adversely affect the residential quality of the Ward. For instance, the residences on the east side of Square 2204 (Woodley Park) have been able to co-exist with the commercial uses on the west side because the commercial quality has been low intensity and neighborhood-oriented. If replaced, however, with the commercial uses and mixed-use densities allowed under the existing C-2-B zoning, the residences would be overwhelmed. Existing scale would be lost. The residences would be buffered from substantial office space by only an alley of 15' width.

This is but one example. ANC 3-C is concerned with Woodley Park because it is part of a larger problem throughout the Ward, including several locations within ANC 3-C. We wish to protect the residential base of our Ward (and the city) from erosion to an alternative-to-downtown office market.

Not only do we believe this to be reasonable, but it is consistent with the Comprehensive Plan. I say this in several respects. The premier theme of the Plan is "stabilizing the District's neighborhoods. ...The District elements of the Plan propose that the residential character of

neighborhoods be maintained and improved." (Sec. 101) It is our position that the level of development now permitted in Woodley Park would adversely affect that neighborhood.

The Plan establishes priorities for development and directs it to certain areas. See the Economic Development Element. For instance: "The economic development outside the Central Employment Area objective is to create and expand economic activity and employment centers in target areas outside the Central Employment Area." (Sec. 211) There are no such target areas west of Rock Creek.

The Land Use Element creates Development Opportunity Areas, "which will accomodate the District's major growth and development needs." (Sec. 1101(g)(2)) Save Friendship Heights, there are no such development opportunity areas west of Rock Creek.

In short, the intensive development pressures along the Connecticut and Wisconsin avenue corridors are not consistent with the goals and policies of the Comprehensive Plan. However, the stabilization of its residential character -- maintaining the current level and quality of existing development -- is consistent with the Plan.

ZONING & DESIGNATION OF WOODLEY PARK AS A NEIGHBORHOOD CENTER

The Comprehensive Plan designates the small commercial core of Woodley Park as "low density" and as a "local neighborhood center." Further, the Plan classifies it as an existing center -- not one that is new or to be upgraded. (see Land Use Policies Map no. 3)

As the Office of Planning has stated in its January 11 report, these designations "suggest a continuation of generally low-scale commercial activity, even recognizing the existence of the Metrorail station. ...The small commercial area at the core is to continue its present function... primarily within the physical scale of the existing buildings. ...The commercial designations in the Plan suggest that this area need not and should not become a significant location for development of office space by means of redeveloping the older, smaller buildings." (p. 20)

OP goes on in its report to argue eloquently against C-2-B, explaining (on p. 21) why C-2-A would be more appropriate. However, rather than recommend rezoning to C-2-A (for Square 2204, since the remainder of the commercial district is already C-2-A), OP recommends an overlay in lieu of C-2-A. We like the overlay -- with modifications -- but otherwise this makes no sense. OP does not really explain.

When a developer comes before you seeking a PUD, often it is accompanied with a request for upzoning. As you know, many of the limitations with PUD's are not fixed but are only guidelines. Nonetheless, rezoning is sought -- and granted -- because it is "cleaner" and clearer. I mention this by way of analogy. In a sense an overlay is like a PUD in that it requires your attention to planning detail for a discrete area. As you often rezone with a PUD, we urge you to rezone with this overlay.

Furthermore, we remain mystified at OP's continuing reluctance to recommend C-1 for already existing low density local neighborhood commercial centers that are not to be upgraded. Is the C-1 zone being saved for some-

thing more low and more local than low density local neighborhood? We would recommend C-1 zoning for the entire Woodley Park node except for the fact that this would create nonconforming structures, due to the heights of buildings, in Square 2204. We still recommend C-1 for Squares 2202 and 2203.

PRESERVATION AND STABILIZATION OF THE NEIGHBORHOOD: REASONABLE DEVELOPMENT

We believe that the reduction of the envelope through downzoning, and the usage/urban design limitations through the overlay, will reduce development pressures in this area. They will allow redevelopment within the existing scale and character, but not alter it. The area can retain its vitality -- not lose it to the new markets seeking alternatives to downtown.

The effect of this, we believe, will be to preserve and stabilize the unique community known as Woodley Park.

PROHIBITION OF PUDs

Finally, ANC 3-C joins with the other petitioners in requesting that the Zoning Commission proscribe Planned Unit Developments from the overlay districts. We recognize that PUDs are subject to rigorous review by the Commission, so it would seem that there is no real basis to eliminate them. However, ANC 3-C shares the widely held public feeling that PUDs often offer a way around existing zoning that, in the end, does not provide a superior project. We believe PUDs should be proscribed from the overlays for three basic reasons:

- 1) In a sense they contradict the premise of the overlay. The overlay sets forth various limitations sensitive to preserving

existing local neighborhood character. PUDs provide a route for "planned" exceptions to the already sensitively planned overlay.

- 2) Allowance for PUDs is virtually an invitation to developers to request PUD-type exceptions to overlay controls. Surely this is likely near the Cleveland Park and Woodley Park Metro stations. Allowance for PUDs invites continued controversy.
- 3) OP admits in its report that existing PUD guidelines would likely conflict with the nature and intent of the overlays. OP, however, offers no proposal (p. 27).

CONCLUSION

In conclusion, ANC 3-C supports the recommendations of the Woodley Park Community Association for rezoning of and overlay controls on the Woodley Park commercial district. This would be consistent with the Comprehensive Plan and our desire to end the economic development march from downtown to west of Rock Creek.

Thank you for this opportunity to testify.