

**POSITIONS OF THE WOODLEY PARK COMMUNITY ASSOCIATION REGARDING  
JBG'S PROPOSALS TO FURTHER DEVELOP PROPERTY IN WOODLEY PARK  
Approved by WPCA on August 17, 2016**

In summary, the WPCA opposes moving forward with this development proposal until such time as demolition of the hotel is no longer highly speculative and a review of the full proposal can be considered, including impacts on the adjacent metro station.

On June 24, 2016, The JBG Companies submitted an application for a Planned Unit Development (or PUD) to the DC Zoning Commission for permission to build a large new building on a portion of the property it owns in Woodley Park that includes the Marriott Wardman Park Hotel - the Consolidated PUD. That portion of the property is currently open space. JBG must obtain special approval because the building would require a zoning change to permit higher density development. On the same day, JBG also submitted a "Phase I PUD" to demolish the existing the Marriott Hotel building and replace it with several additional residential buildings in future years, adding 4,000+ new residents to a neighborhood of 7,500 residents. (Please also see the ANC3C memo on JBG's proposal, at: [http://anc3c.org/?wpfb\\_dl=391](http://anc3c.org/?wpfb_dl=391).)

The Woodley Park Community Association has developed the following consensus summaries of our positions regarding JBG's plans. These positions will likely be refined over time, and shared with our neighbors, city officials, and other stakeholders to indicate our community's concerns and preferences on JBG's applications.

- Redevelopment of this large tract of land should be planned in a comprehensive way, not undertaken in a piecemeal manner through two separate PUD applications. The best way to do this is with a Small Area Plan such as that created for redevelopment of the Walter Reed campus, or with detailed planning for Woodley Park within the context of the expected 2016-17 DC Comprehensive Plan update.
- JBG's Consolidated PUD application for a massive 120 foot tall building along Woodley Road is not consistent with existing zoning, which is moderate density, or with the Comprehensive Plan which designates it as a Neighborhood Conservation Area and allows for medium and some high density - as detailed in ANC3C's report to the zoning commission (referenced above).

- The applicant claims that the lot is entirely built out to the maximum extent permitted by zoning regulations (it is at the maximum permitted FAR/density), and yet the developer is aggressively seeking to squeeze an enormous structure adjacent to the historically designated Woodley Park neighborhood and Wardman Tower building and is requesting upzoning from moderate to high density to accomplish this. The developer is overreaching in a manner void of any consideration for the Woodley Park community or stated DC development standards.
- JBG previously chose to build the high density 9 story Woodley Apartment building “by right” (90 ft from lot lines in a location zoned moderate density, which zoning regulations describe as typically consisting of row houses and 3-4 story apartments) and is now in a systematic manner applying for upzoning of the remaining property. Surprisingly, JBG now argues that its requested upzoning is justified based upon the close proximity of an adjacent high density building (which JBG itself recently built!). This contradicts the intent of our zoning laws. If this were the proper interpretation, then an area zoned moderate could become high density just by systematically building massive buildings in immediate series rather than simultaneously. Allowing such an interpretation to proceed would establish a road map for skirting the clear intent of DC’s zoning laws.
- The applicant owns the hotel property and plans to eventually demolish the hotel. In the meantime, the applicant chooses to waste DC Government time requesting a change in zoning that will not be necessary once the hotel is demolished. It appears that the upzoning is perhaps being requested to drive out the hotel operator. The DC Government should not take sides in this dispute between two private parties by allowing the upzoning, but should wait until the dispute is resolved.
- The overall building footprint (GFA) is an almost 90% increase in site occupancy, making the site occupancy more than 30% higher than the adjacent sites. The proposed first building would remove a majority of the current open space.
- Both the Woodley and the Wardman Tower are luxury buildings with condo prices ranging from \$2.5-\$9 million and rental prices set at \$3,000- \$10,000/month - levels that are approximately 20% above market rate. The building contemplated by the Consolidated PUD is similar in scope and size to the Woodley Apartments (previously developed and sold by JBG) and therefore would add another massive luxury building to Woodley Park - with limited affordable housing benefits, and negligible other benefits to

existing city residents.

- The proposed building is 8 stories plus penthouse plus mechanical structures, bringing its height to approximately 120 ft along a two-lane city street of 23 ft in width. Across Woodley Road from the proposed site is an historically designated neighborhood of three story rowhouses and four story small apartment buildings. A building of this height and mass in this location is not consistent with the Comprehensive Plan, which designates the site as moderate density and neighborhood conservation recognizing that high density was not anticipated or appropriate.
- The current gradual nature of transition from moderate to medium to high density in zoning for Woodley Park moving south from the historically designated residences is reflected in the current Comprehensive Plan.
  - The Historic District is zoned R-3 (moderate density houses). As one moves south across Woodley Road, the current open space and most of the Marriott Hotel are zoned RA-2 (moderate density apartments). As one continues to move south, a narrow portion of the Hotel bordering Calvert Street is zoned RA-4 (high density apartments).
  - This gradual transition is reflected in both applicable zoning, the Future Land Use Map, and the Comprehensive Plan.
  - Approval of JBG's PUD would replace this gradual transition with a sudden transition from moderate density on the north side of Woodley Road to high density on the south side of Woodley Road, a substantial transition that is out of character for every other part of Woodley Park.
- The area that would be taken for the consolidated PUD is currently a well-used open space that was previously identified by JBG as a park that would be open to Woodley Park residents, especially children. Such open space is important in a neighborhood that includes many children, and particularly in a part of the neighborhood that lies in close proximity to Oyster Elementary School, Aidan Montessori School and the National Zoo. JBG's proposal emphasizes the number of family-sized apartments it will add to our neighborhood at the same time it reduces open space suitable for family use. JBG's current proposal to reduce the size of that community amenity from 63,000 square feet by 60% (JBG uncorroborated measurement is that 25,000 square feet would be left) is a substantial community detriment. Further, this area is by far the largest left in the proposed development and will be used by the 500 new residents of the adjacent

building and eventually by the thousands of new residents. So, the developer's characterization of the public easement as a benefit is not authentic.

- Construction of the Consolidated PUD building would interfere dramatically with the functioning of the Marriott hotel. The construction on the front lawn of the Marriott means years of very loud, dirty construction that is likely to disrupt traffic and peaceful enjoyment of our neighborhood, as well as taking away even more open space to use for construction staging. The proposed construction site is a few feet from the front entrance to the hotel and it is not likely that the hotel could continue to function successfully during construction. The damage to the hotel business would in turn impact the businesses and restaurants in our neighborhood.
- It would also be irresponsible for any large development in this area near the Woodley metro to commence prior to 2020 during the time that: 1) a major Beach Drive project is re-routing significant traffic through the neighborhood and 2) the metro safety work disruption is ongoing.
- In addition the larger overall second PUD proposal to demolish the existing hotel, which is currently under management contract options extending to 2059, and build several large apartment buildings is just too speculative to consider at this time.
- JBG's proposed second PUD would include 1.2 million square feet of buildings, and 4,000+ residents. Obviously adding that number of new residents to a neighborhood of 7,500 people would radically change a neighborhood, which is now attractive to young families sending their children to the at capacity Oyster bilingual Elementary School. Clearly this PUD cannot be approved without much more careful consideration of impacts on a stable neighborhood, including school, traffic, and environmental impact.

**Acronyms, Definitions, and References:**

- Comprehensive Plan - A plan for all of the District of Columbia that was adopted by the Council and thus enacted as law. It provides policies for land use and development, current zoning, as well as an approved "Future Land Use Map."
- FAR/Density - Floor to Area Ratio: The proportion of building floor area (added together for all floors of a multi-story building) to the size of the record lot. Different zoning density categories permit different maximum FARs, for example, a lot zoned for Moderate Density Residential Apartments (RA-2) may have building(s) that, in total, reach up to a FAR of 1.8.
- FLUM, or Future Land Use Map - a map that shows zoning for anticipated future development (which may or may not be the same as current zoning). The FLUM is a part of DC's Comprehensive Plan.
- PUD - Planned Unit Development, a written application to the DC Zoning Commission for approval of a proposed development that may vary from current zoning regulations.
- Consolidated PUD: The application JBG has filed in hopes of approval for re-zoning that will allow it to begin building a new, additional structure at 2660 Woodley Road. This PUD includes specific architecture plans for the proposed building.
- Phase I PUD: The application that JBG has filed indicating its long-term intent to replace the Hotel buildings (currently leased and operated by Marriott) with four additional residential buildings. Specific architectural plans have not been created for these buildings.