

SPRING VALLEY • WESLEY HEIGHTS

Citizens Association

WASHINGTON, D.C.

**4601 Tilden Street NW
Washington, D.C. 20016**

July 19, 2018

The Honorable Anthony Hood, Chair
D.C. Zoning Commission
441 4th Street NW, Suite 200S
Washington, D.C. 20001

**RE: Z.C. Case No. 18-06 – Office of Planning Text Amendment To Subtitle G
Creating A New MU-4A Zone And Remaining MU-4 To MU-4B**

Dear Chairman Hood and Commissioners:

The purpose of this letter is to outline the support of the Spring Valley – Wesley Heights Citizens Association (SVWHCA) for the proposal offered by the D.C. Office of Planning (OP) in Zoning Case No. 18-06 for a text amendment to the Zoning Regulations of 2016 to establish a new MU-4A zone and rename the MU-4 zone as MU-4B. The Association's support for this measure is based on the April 24, 2018 detailed report filed by OP in this case and the SVWHCA's long-time experience of working on zoning issues affecting the Spring Valley and Wesley Heights neighborhoods .

The SVWHCA was incorporated in 1952 and is the longest surviving organization operating within the Spring Valley and Wesley Heights communities. The Association advocates solely for the interests of residential properties and their owners, including their interest in active and thriving neighborhood-serving commercial services. Unlike other groups in our neighborhoods that exist primarily to promote and encourage new development, the SVWHCA has long been involved in working to ensure residential properties are protected from development that is inconsistent and out-of-scale with the low density residential characteristics that define our neighborhoods and make our neighborhoods an attractive place to live and raise a family. The Board of the SVWHCA, which is authorized to act on behalf of the Association on matters like Z.C. Case No. 18-06, is comprised of community activists from both the Spring Valley and Wesley Heights neighborhoods. Several of our Board members live in areas that could be directly affected by the issues under consideration in Z.C. Case No. 18-06.

We applaud OP for being responsive to the concerns expressed initially by members of the Zoning Commission (ZC) when the ZC debated the language of the proposed new zoning regulations that went into effect in 2016. At that time, ZC members stressed that revisions to the new regulations would be considered as circumstances merited revision. Establishment of the

MU-4 zones was one of those issues that generated significant concern across the city for its potential impact on low density residential neighborhoods adjacent to commercial zones. Zoning Case No. 17-11 demonstrates that new development in an MU-4 zone could have a significant impact on an adjacent low density single-family residential neighborhood and that the MU-4 zone may have been a cookie cutter-like approach and defined too broadly to protect low density residential neighborhoods.

In its April 24, 2018 report to the ZC, OP also indicated that “there may be other locations in the city with a similar situation where a modified version of the MU-4 zone may also be appropriately applied.”

There are locations within the boundaries of Spring Valley-Wesley Heights where the new MU-4A zone should apply because of the proximity of the commercial zone to low density residential properties. **The SVWHCA strongly encourages the ZC to direct OP to map the new zone automatically in all those MU-4 zones where low-density residential zones and commercial zones share a zone boundary or are separated by an alley or a street.**

Moreover, the SVWHCA encourages the ZC – in the course of its deliberations in this case – to resolve issues over definitions of words, like “adjacent,” “abut,” or “confront” as they relate to commercial zones bordering low density residential neighborhoods. Low density residential neighborhoods that share a boundary with a commercial zone are no less impacted by the density of the bordering commercial zone whether it is separated by an alley or street than if a commercial building and low density residential property are literally back-to-back. It makes no sense to establish an MU-4A zone if it is limited solely to bordering properties that are not separated by an alley or street.

Although the SVWHCA supports the text amendment proposed by OP in its April 24 report, the SVWHCA is concerned that OP’s July 17, 2018 “Correction Report” proposes to revise the minimum rear yard to be 15 feet instead of the 20 feet referenced in OP’s original report. Precisely because the MU4-A zone is being established because of its proximity to low density residential properties, the SVWHCA believes the 20 foot rear yard is appropriate and further helps to differentiate the MU-4A zone requirements from the MU4-B.

Z.C. Case No. 18-06 provides the ZC with an opportunity to correct the 2016 regulations and make a sorely needed change that helps protect low density residential neighborhoods that border commercial zones – residential neighborhoods that had enjoyed protections in the zoning regulations until the MU-4 zone was established in the 2016 regulations.

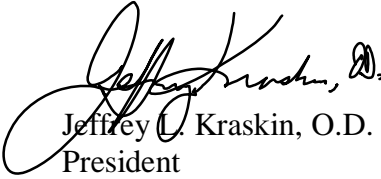
The SVWHCA also wants to express its appreciation to the Committee of 100 on the Federal City for its careful and thoughtful scrutiny and analysis of OP’s proposal. The city’s residents are fortunate to be able to rely on the zoning expertise and experience that the Committee of 100 brings to zoning cases like Z.C. Case No. 18-06.

Given the need to protect existing low density residential properties bordering MU-4 zones, the SVWHCA also strongly supports the recommendation made by the Committee of 100 on the Federal City to cap the Floor Area Ratio (FAR) for the new MU-4A zone at 1.5 instead of

the 2.0 proposed by OP. We believe this is more consistent with the objectives of the text amendment.

Thank you for the opportunity to present these views in this important case.

Sincerely,



Jeffrey L. Kraskin, O.D.
President