



Government of the District of Columbia
**Advisory Neighborhood
Commission 6C**

November 8, 2018

Anthony J. Hood
Chair
Zoning Commission
of the District of Columbia
441 4th Street, NW
Suite 210-S
Washington, DC 20001

Re: ZC 18-07 (Map Amendment, Square 750)

Dear Chairman Hood:

We write to provide our views on the map amendment requested in ZC 18-07. As explained below, ANC 6C opposes the request.

On October 10, 2018, at a duly noticed and regularly scheduled monthly meeting, with a quorum of five out of six commissioners and the public present, this case came before ANC 6C. The commissioners voted 3-2 to support the Zoning Map amendment on the condition that the property owner hold a community meeting and reached an agreement with neighbors in Square 750. Two meetings with neighbors were held, but no agreement was signed; therefore, the ANC opposes the petitioner's request.

ANC 6C agrees that the present industrial (PDR) zoning makes no sense for the site, which is, like the entire block north of Parker St., currently residential in character. However, the proposed rezoning is inconsistent with the Comprehensive Plan—specifically, with the Generalized Policy Map's explicit designation of this area as a "Neighborhood Conservation Area."

The Comprehensive Plan (10-A DCMR §§ 223.4-.5) describes these areas as follows:

Neighborhood Conservation areas have very little vacant or underutilized land. They are primarily residential in character. **Maintenance of existing land uses and community character is anticipated over the next 20 years. Where change occurs, it will be modest in scale and will consist primarily of scattered site infill housing.**

public facilities, and institutional uses. Major changes in density over current (2005) conditions are not expected but some new development and reuse opportunities are anticipated. Neighborhood Conservation Areas that are designated “PDR” on the Future Land Use Map are expected to be retained with the mix of industrial, office, and retail uses they have historically provided.

The guiding philosophy in Neighborhood Conservation Areas is to conserve and enhance established neighborhoods. Limited development and redevelopment opportunities do exist within these areas but they are small in scale. The diversity of land uses and building types in these areas should be maintained and **new development and alterations should be compatible with the existing scale and architectural character of each area.** Densities in Neighborhood Conservation Areas are guided by the Future Land Use Map.

(Emphasis added.)

Although most of the block is already zoned MU-5A, that is not reflected at all in the existing built environment. The K Street frontage is an unbroken row of essentially identical two-story historic rowhouses with projecting bays. Parker Street’s north side consists almost entirely of very small flat-front two-story historic rowhouses. Although there are a few visible commercial uses—most notable, Indigo restaurant on the corner of Third and K Streets—they occupy buildings whose street-facing form has not changed in a century. (Moreover, the current zoning of the majority of this block is not *per se* a relevant factor under the Comprehensive Plan analysis.)

The proposed zones would allow new construction of 50’ (MU-4) to 65’ (MU-5A), as well as office use occupying floor area of 150% of the lot area. The proposed zones are therefore wholly inconsistent with the standards in the Generalized Policy Map for Neighborhood Conservation Areas and would only increase the potential for the existing scale to be altered substantially.

More intensive development on the west end of the square is likely to have significant adverse consequences for the local transportation network. As ANC 6C has repeatedly expressed, traffic volume and speeds on K Street are far too high. Second Street, one lane in each direction, is already overburdened owing to other development to the south and to the north, and adding pick-ups and drop-offs at a future development south of K Street so close to the intersection will result in dangerous conditions for pedestrians, bicyclists and drivers. In addition, the 10’ east-west alley—which at its west end opened onto Second Street until the Council closed that portion in 1995—is poorly configured to provide access for the necessary loading and parking for any future Second Street project.

In summary, neighbors on the block have expressed opposition to increased density and concerns particularly about the impact of increased density on the use of the alley behind the project. They also expressed hope that the entire block of intact rowhouses would be preserved.

Thank you for giving great weight to the views of ANC 6C.

Sincerely,

A handwritten signature in cursive script that reads "Karen J. Wirt".

Karen Wirt
Chair, ANC 6C