

West End Citizens Association

Washington, D.C.

Boundaries: 15th Street on the East • Potomac Park on the South
Rock Creek and the Potomac on the West • N Street on the North

December 12, 2019

PlanDC

DC Office of Planning

1100-4th Street, S.W. #E650

Washington, DC 20024

Re WECA's Comments on OP's Oct. 2019 Draft Comprehensive Plan

Dear PlanDC:

This e-mail comments on the Office of Planning's (OP) October 2019 Draft Comprehensive Plan (Comp Plan) by the West End Citizens Association (WECA), one of the oldest citizens associations in DC. The WECA includes members who reside throughout Foggy Bottom-West End.

The WECA submitted three proposed Amendments, all three of which were rejected by OP with OP saying, the "Proposed amendment is inconsistent with completed plans or policy documents." This comment letter will expand on all three of the WECA's proposed Amendments and provide additional comments on OP's draft text.

- a. #1348 – WECA objected to OP's essentially redefining "Downtown" and "Central Area" into a 3-fold expansion of the statutorily-defined "Central Employment Area" (CEA) (including an expansion in the West End) and including exemption of the entire larger area from desirable Inclusionary Zoning (IZ), protective NEPA, etc.
- b. #1349 – WECA objected to language in OP's proposed Framework Chapter which undermined the DC Home Rule requirement that zoning shall not be inconsistent with the Comp Plan by watering down clear land use definitions (e.g., indicating maximum height and number of stories in each zoning category, such as **Moderate** vs. **Medium** Density Residential).
- c. #2520 – WECA asked for retaining and enforcing current law which defines the publicly-owned land between M Street and Virginia Avenue and between 26th and 29th Streets as permanent parkland and which specifies that this land shall not be used for development.

With respect to (a.) above, in §304.8, Policy LU-1.1.3: Central Employment Area, the WECA recommends deletion of “the CEA may include additional land.” Also, in §304.14, Action LU-1.1.a: Central Employment Area Boundary, the WECA recommends deletion of “**Renew request to Encourage** the National Capital Planning Commission to amend the boundary of the CEA depicted in the Federal Elements to match the boundary shown in the District Elements of the Comprehensive Plan.” As the WECA repeatedly stated, DC’s expanded Downtown/Central Area (an expanded CEA) should be subject to Inclusionary Zoning (IZ), especially if DC wants to increase affordable housing which is desired by the WECA and many citizens throughout DC.

With respect to (b.) above, the Council’s revision of OP’s draft Framework Chapter is still inadequate in fully protecting citizen objections to out-sized development proposals which are inconsistent with the Future Land Use Map (FLUM).

With respect to (c.) above, the WECA applauds OP’s rejection of 3 undermining proposals submitted by the landowner of three isolated rowhouses: #2469, #2473, and #2488. The submission seeks to increase his property value by allowing development to replace this permanent parkland area. Such development would result in the loss of treasured parkland and create an increase in already difficult vehicular traffic. The WECA is pleased with §2115.10, Policy NNW-2.5.4: West End/Foggy Bottom Parkland, especially maintenance of the existing statutory protection stating, “The publicly-owned land between M Street and Virginia Avenue and 26th and 29th Street, which includes both federally-owned and District-owned land, shall be retained as parkland and shall not be used for development or highways.” The WECA worked hard to ensure that this language has essentially been included in each of DC’s successive Comp Plans starting in 1994.

Also, the WECA recommends deletion of all or most especially the unnumbered NEW paragraph below §2115.10 stating, “... **and new development parcels by reconfiguring existing transportation infrastructure. Reconnecting to the city grid is essential for improving neighborhood connectivity and to support desirable enhanced transportation, improved park accessibility, increase housing and neighborhood-oriented development.**” The Foggy Bottom-West End community, especially the surrounding community is united in its opposition to any new development in this permanent parkland area with the exception of the owner of the three isolated rowhouses. In fact, OP rejected this proposal in #2488 (and obliquely also in #2473). If OP does not make this change, the WECA will present strenuous objection during the City Council’s review period.

Additional Comments

The George Washington University (GW) submitted six proposed Text Amendments. OP rejected three (#2390, 2404, and 2478) and accepted three (#2479, 2411, and 2415). One of those accepted (#2479) is objectionable since it is inconsistent with the Zoning Commission’s approval Order for the current 20-year Campus Plan and is also inconsistent with GW’s position in past negotiations with the Foggy Bottom-West End community. GW’s proposed amendment argues for removal of the cap on the number of students. The WECA believes that this cap is

essential to protect any further GW encroachment into the existing Foggy Bottom-West End Area.

In §1214.7 Policy EDU-3.3.3, Universities as Large Landowners and Campus Plan Requirements, the WECA recommends that OP retain the longstanding critically protective textual requirement: “ensure that the institution is not likely to become objectionable” to neighboring property because of noise, traffic, number of students, or other similar conditions. This has been the principal protection for residential communities and the WECA believes that it is critical to be preserved.

There was only one proposed Map Amendment in Foggy Bottom-West End: #1744 to rezone 601-24th Street (currently the 9-story Remington apartment building) to allow for increased height up to 130 feet. This Map Amendment for only part of one Square would be undesirable “spot zoning.” Also, the proposed Map Amendment does not seem justified and could set a bad precedent for the rest of Foggy Bottom-West End. Nonetheless, OP recommended it without any detailed explanation or justification. The WECA disagrees and recommends rejection.

In OP’s 2-page “Near Northwest” document, the WECA objects to “leveraging air rights in Foggy Bottom” which is under “Expanding Housing Opportunities.” The WECA was unable to locate language for this provision in the full Comp Plan text. In any case, leveraging air rights could open development pressure outside of the George Washington University (GWU) Campus Plan boundaries. GWU’s Campus Plan identified 16 development sites for the 20-year period of the Campus Plan and each site has a specific maximum height and density, and the Zoning Commission Order included a maximum cumulative Floor Area Ratio (FAR). So, the effect of the leveraging air rights could adversely affect the non-GWU parts of Foggy Bottom-West End, including the low-density residential Foggy Bottom Historic District and other current residential areas. Such development could lead to displacement of elderly residents and other long-time residents, especially those in rental housing much of which is rent-controlled.

In §2115.4, there is a factual error. It erroneously states, “**including a new library with eight stories of residences above, including a number of affordable units.**” The affordable units are all in the companion development site above the new fire station.

In §2115.6, please change “would be” desirable to “is” desirable for a new second entrance for the Foggy Bottom/GWU Metro Station. For years, the WECA has led the request for a very much needed second entrance especially due to the increase in office space in the surrounding area.

If you have any questions about this letter, please contact WECA Secretary-Treasurer Barbara Kahlow at Barbara.Kahlow@verizon.net.

Sincerely,

/s/
Sara Maddux
President