

IN REPLY REFER TO:
NCPC File Nos. CP19/7151

SEP 03 2010

The Honorable Vincent Gray
Chairman
Council of the District of Columbia
John A. Wilson Building, Room 504
1350 Pennsylvania Avenue, NW
Washington, DC 20004

Re: NCPC Comments on Bill 18-867, Amendments to the District Elements of the Comprehensive Plan

Dear Chairman Gray:

The National Capital Planning Commission has reviewed Bill 18-867 which proposes amendments to the District Elements of the Comprehensive Plan for the National Capital. The points summarized below represent staff's initial analysis of the comprehensive plan amendments and do not reflect official Commission action or position.

- NCPC is supportive of the amendments related to the St. Elizabeths development and leveraging the Department of Homeland Security project into revitalization efforts for the surrounding neighborhoods. Staff is also very supportive of the amendments related to the implementation of the CapitalSpace Plan, a joint NCPC-District of Columbia initiative aimed at improving and integrating local parks and recreation facilities throughout the city.
- Bill 18-867 proposes changes to policies related to the development of the Southwest Waterfront. NCPC is very supportive of the redevelopment of this waterfront and has been working to integrate the project with revitalization of the 10th Street Corridor and Banneker Overlook. Amending the policies to allow more flexibility in the programming for the Southwest Waterfront while maintaining the goal that the waterfront is a sustainable and compact development that is less dependent upon vehicular modes of transportation and is in concert with the NCPC's goals.
- Staff generally supports the amendments regarding the reknitting of the city through air-rights development. As a policy, this is consistent with many ideas highlighted in the Monumental Core Framework Plan, which expects to increase the connectivity of the monumental core with other areas of the city by mitigating transportation barriers through such techniques as air-rights development. Staff is also supportive of identifying the Center Leg Freeway and the Union Station Air rights as priority areas. Furthermore, NCPC has been analyzing methods by which to eliminate the barriers created by the

Southeast/Southwest Freeway as part of the 10th Street Task Force work program and is exploring similar methods.

- Regarding the air-rights initiative, NCPC is supportive of the new language recommended for Policy CW-2.8.E that establishes the need for a public planning process for the Union Station Air Rights project. This project has the potential to alleviate the barriers established by the historic Union Station rail lines and provide an exciting mixed use development for the H Street, NE corridor. However, the location of this project is in a sensitive area as it is directly adjacent to the historic Capitol Hill neighborhood and directly in sight of Union Station. A development out of scale with these areas could have significant impacts to this area. While staff supports a public planning process for the project, there are concerns with the proposal to eliminate policy CH-2.1.7. This policy currently states that the allowable height of any building constructed in the air rights should be measured from the existing grade of 1st Street or 2nd Street NE, rather than from the overpass. The proposed bill will eliminate this policy, leaving the method of measurement for the Union Station air-rights unclear. In NCPC's view, the existing policy is consistent with the interpretation of the 1910 Height of Buildings Act and it also provides a clear guideline that will produce a project design that is sensitive to the existing surroundings. NCPC recommends that Council not eliminate or change Policy CH-2.1.7

Please consider these comments as the Council deliberates Bill 18-867. NCPC looks forward to reviewing these amendments to the District Elements of the Comprehensive Plan once the Council has taken a formal action. If you have any questions, please contact David Zaidain of my staff at 202-482-7230.

Sincerely,



Marcel Acosta
Executive Director

cc: Robert Miller, DC City Council
Harriet Tregoning, DC Office of Planning