

The Committee of 100

on the Federal City



Building on 100 Years of Planning Advocacy

June 23, 2023

BEFORE THE ZONING COMMISSION OF THE DISTRICT OF COLUMBIA

CASE NO. 23-02

APPLICATION OF THE OFFICE OF PLANNING TO REZONE SQUARE 0157, LOT 826 (1617 U ST. NW) AND LOT 827 (1620 V ST. NW) FROM THE MU-4 ZONE TO THE MU-10 ZONE

STATEMENT IN OPPOSITION BY THE COMMITTEE OF 100 ON THE FEDERAL CITY

The Committee of 100 on the Federal City (C100) appears in opposition to this application submitted by the Office of Planning (OP). The upzoning would be inconsistent with the Comprehensive Plan's Mid-City Area Element and would deal a serious blow to the principle of adapting infill development to the surrounding neighborhood. Simply put, there need to be guardrails placed on any development of this site.

C100 recognizes that the rezoning responds to the new FLUM designation of the lots to Local Public Facilities/ High Density Residential /and Moderate Density Commercial. However, and as pointed out in OP's set-down report¹, the upzoning will permit a structure of 120 feet in height on the site given the IZ bonus. Also, the OP set-down report states that "Lot 827 slopes approximately 5 feet downward from north to south."² Lot 826 presumably does so also. In fact, the slope may be even greater there, as Lot 826 extends further north. Since a developer can choose where to measure the height of a building for compliance with height limitations, we must assume that the maximum height could be at least 125 feet. As pointed out in some of the letters in opposition, a structure of this height would approach that of buildings downtown and could equal that of almost any building in the city. Significantly, the higher height would be on the portions of the building adjacent to the surrounding row houses.

The subject property is currently zoned Mixed-Use MU-4. The MU-4 Zone covers the subject property, the four corners of 17th and U Streets, and U Street as far east as 16th Street. Most of the property surrounding the MU-4 area is zoned RA-4 for moderate density residential rowhouses and apartment buildings. The MU-10 rezoning, in contrast, would allow much higher density development. Also, the

¹ Exhibit 2, pages 6-7.

² Id., page 3.

site is bordered by the Strivers' Section historic district on the north, south and west, and by the 16th Street historic district on the east. Further, as pointed out in OP Report: "Depending on height and setbacks, [the allowed height of the structure] may result in increased shadowing during the winter on the north side of V Street and its two story rowhouses. Again, depending on height, design and use it is possible that there may be morning shadows cast onto buildings facing the west side of 17th Street between U and V Streets, possibly up to Florida Avenue during winter months."³

The site lies within the Comprehensive Plan's Mid-City Area Element. That Element of the Comprehensive Plan sets general policies and actions to guide growth and neighborhood conservation decisions in the Mid-City Planning Area, including that:

- The historic character of Mid-City neighborhoods, particularly its row houses, older apartment houses, historic districts, and walkable neighborhood shopping districts, be retained and reinforced;⁴ and
- "Infill development should be compatible in scale and character with adjacent uses."⁵

A 12-13 story building on the subject site would be inconsistent with both of these directives.⁶ We also point out that the recently unveiled design for the replacement to the Reeves Center, located on 14th Street, a major thoroughfare, would appear to be shorter than what would be permitted on the subject property. The Office of Planning abdicates its responsibility to assure compatible scale by even proposing a structure so completely out of harmony with the character of its surroundings.

The site is surrounded on three sides by rowhouse neighborhoods with a significant Black population. As C100 has previously stated, any racial equity analysis needs to take into consideration the potential displacement of those living in a defined surrounding zone. This potential impact is likely to occur here and should be reviewed more carefully through the Commission's racial equity lens. Also, some of these two-story rowhouses would be deprived of sunlight during significant portions of the day, effectively preventing installation of solar panels or just the simple enjoyment of sunlight.

In summary, any structure that would utilize the full potential of the MU-10 zoning would stick out like an unwanted pop-up and would deal a serious blow to the principle of adapting infill development to the surrounding neighborhood. Any such structure would simply be too tall for the location. We assume that this is the reason Council Chairman Phil Mendelson opposed the proposed change to the FLUM that is the basis for this up-zoning. We respectfully request that this upzoning application be denied or, at a minimum, that guardrails be set in place that would protect and preserve the surrounding neighborhoods.

³ Exhibit 58, page 20.

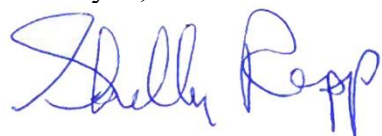
⁴ Mid-City Area Element, Section 2008.2.

⁵ Mid-City Area Element, Section 2008.4.

⁶ These provisions have counterparts in a number of the Comprehensive Plan's Citywide Elements.

Nothing prevents the Zoning Commission from approving a building application that would be smaller than the maximum permitted by the FLUM or by a site's zoning. We suggest that limits could be included as part of any upzoning approval granted by the Zoning Commission.

Thank you,

A handwritten signature in blue ink that reads "Shelly Repp". The signature is written in a cursive, flowing style.

Shelly Repp
Chair of the Committee of 100
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