

**MEMORANDUM**

**TO:** District of Columbia Zoning Commission  
**FROM:** *JL for* Jennifer Steingasser, Deputy Director  
**DATE:** May 4, 2015  
**SUBJECT:** Supplemental Report for a Proposed Text and Map Amendment (ZC 14- 22)  
Create New Zoning for the District's Portion of the Former Walter Reed Campus

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This memorandum provides responses to Zoning Commission requests, from the April 2<sup>nd</sup> public hearing, for additional information.

**ADDITIONAL INFORMATION REQUESTED BY THE COMMISSION**

***1. Consistency with the Small Area Plan***

The Commission asked the Office of Planning (OP) to address again the consistency of the proposed zoning with the Walter Reed Small Area Plan adopted by Council. The proposed zoning would not be inconsistent with the text, policies, graphics (such as section drawings), and the Future Land Use Map contained in the Council approved Small Area Plan (SAP). As with all plans, the Walter Reed SAP is evaluated and interpreted in its totality, together with the Comprehensive Plan, and together with the context in which it is found.

The proposed heights, densities, uses, open spaces and design principles codified in the zoning are reflective of the guidelines of the SAP, and would help implement the four main goals of the plan:

1. Integrate the Site with the Community
2. Provide a Mix of Uses
3. Create New Jobs and Revenue for DC
4. Activate the Site

The zoning benefits from the specificity of the Walter Reed plan, which includes a detailed Future Land Use Map. The zone boundaries are directly based on the Future Land Use Map (FLUM) boundaries, and the zoning heights and densities are consistent with the land use designations on the FLUM, as defined in the Comprehensive Plan and the SAP. The SAP also includes specific recommendations for certain building forms such as step backs, setbacks or tall ground-floor heights, as well as desired outcomes such as streetscapes activated by retail and maintenance of important green spaces. The proposed zoning is not inconsistent with the Walter Reed Small Area Plan.

## ***2. Aerial View of the Potential Development Massing***

Please see Attachment 1 for an aerial rendering of a potential development scenario possible under the proposed zoning, showing relationships of potential buildings to nearby existing development.

## ***3. Site Plans for Potential Rowhouse Layouts***

The Commission asked for site plans depicting the potential layouts of rowhouses in WR-1, given the different options for rear yard requirements. The draft zoning text contains an option for no rear yard requirement and an option for a 20 foot rear yard requirement. The Commission has also discussed the possibility of rowhouses with detached garages. Please see Attachment 2 for schematic site plans showing the three options, as well as a section drawing depicting how the detached garage option could be accommodated given the grades on the site. OP made certain assumptions to create the renderings, and the options do not depict actual development proposals. The assumptions included the width of the alley, the depth of the houses and the depth of the garages. In the detached garage scenario, the depth of the house was assumed to be less because there would be more usable floor area in the house with the removal of an integral garage. However, a 35 foot deep rowhouse, while certainly found throughout the District, appears, based on a high-level GIS search, to be on the low end of typical rowhouse depths, and deeper rowhouses could be expected in future development on the Walter Reed site.

Given this analysis, the detached garage option could potentially fit, although on the north side, the yard or patio space could be as narrow as 10 or 12 feet, or less with a deeper house. A more sizeable yard is possible for the units facing Elder Street. But deeper footprints would decrease the depth of the yard, especially if a developer pursues a 2-over-2 unit; In an example of those types of units from Fort Lincoln, the depth of the structure was approximately 50 feet, which in this setting would leave a rear yard of about 12 feet in depth. The depth of the block between Elder and Fern Streets – 188 feet – would be narrow compared to other blocks throughout the city with detached garages, which appear to average well over 200 feet deep.

The option for no rear yard requirement would of course grant the most flexibility, while the option for a 20 foot rear yard requirement could result in extra lot area dedicated to only driveway space.

## ***4. Kiosk Space in the WR-6 Zone***

Based on Commission feedback, the proposed text has been revised to allow five permanent structures in the WR-6 zone, each limited to a maximum floor area of 400 square feet. The exact size of the structures, and their placement and design, would be governed in detail by the Historic Preservation Review Board, who would review any new structures in the WR, including on the Great Lawn and associated open spaces. Please see Attachment 5 for the revised zoning text.

## 5. *Response to ANC 4A Comments*

ANC 4A voted to recommend approval of the proposed zoning, but their resolution included a number of remaining topics of concern that the Zoning Commission asked OP to address. The following topics were taken from the testimony of the ANC presented at the public hearing

**Zoning – Future Amendments –** The ANC expressed concern that the zoning could be changed in the future without consultation with the community. As with any change to the zoning text or map, any future amendments to the WR zone would require a full public hearing before the Zoning Commission. ANCs would have an opportunity to comment and would be given great weight.

**Zoning – Comparison to Development at Military Road and Connecticut Avenue –** The ANC’s written testimony stated that ANC 4A “is strongly opposed to development that will lead to a situation similar to the development at Military Road and Connecticut Avenue, NW.” The development referred to is being built in conformance with the R-5-D zoning in place at that site. The part of the WR zone that would permit development with similar height and density to R-5-D, consistent with the Small Area Plan, would be WR-2<sup>1</sup>, which is located in the center of the Walter Reed campus, separated from existing development by lower scale buildings. The WR zoning would also include provisions to help activate the ground floor and adjacent sidewalks.

**Through Traffic and New Streets – 13<sup>th</sup> Street –** ANC 4A is opposed to “the creation of a new 13<sup>th</sup> street vehicular access on the WR campus.” The proposed zoning can neither require nor prohibit the creation of a new 13<sup>th</sup> Street. While the proposed map amendment uses the street network, as shown in the SAP, to help define the zone boundaries, the zoning is not directly dependent on the streets or any particular street alignment. Streets are established by City Council action independent of zoning.

**SAP Siting and Building Sizing – Townhome Strings –** ANC 4A recommends “that townhome strings be limited to no more than 4 units long...” The proposed zoning does not prohibit the establishment of four-unit townhome strings. Such a building form would be very unusual for DC rowhouse neighborhoods, so therefore is not required by the proposed text.

**SAP Siting and Building Sizing – Front Yards –** The ANC recommended that front yards on Fern Street have a minimum dimension of 15 feet. Properties on the south side of Fern Street, including the Walter Reed campus, have a 15-foot Building Restriction Line, in effect mandating a front yard for the homes on that street.

**SAP Siting and Building Sizing – Height of Elder Street Townhomes –** ANC 4A supports heights of up to five stories on Elder Street, as long as “absolute” building heights are compatible with existing homes on Fern Street. The grade decreases about 14 feet from Fern

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<sup>1</sup> R-5-D permits a height of 90 feet and an FAR of 3.5; W-2 would permit a height of 85 feet and an FAR of 2.5 to 3.75.

Street to Elder, so although townhouses would be taller from the ground, they would not be significantly taller in elevation, if at all, and they would still achieve the goal of the SAP of providing a transition to taller development south of Elder Street.

SAP Siting and Building Sizing – The ANC requests “limiting the minimum size for market rate homes on Fern Street only to 2,000 Square Feet (SF) to be consistent in size with homes directly on the north side of Fern Street.” In the District, zoning does not mandate minimum or maximum sizes for residential units, nor does the Small Area Plan note such a restriction, so none is proposed here.

SAP Siting and Building Sizing – Georgia Avenue Building Form and Open Spaces – ANC 4A supports the proposed building heights, setbacks and proposed open spaces along Georgia Avenue.

SAP Siting and Building Sizing – WR-8 – The ANC supports the proposed zoning for the WR-8 parcel.

Town Center – WR-2 – The ANC supports the proposed WR-2 zone, including building heights and liner uses.

Topography – Building Heights – The ANC is supportive of the overall proposed zoning restrictions on buildings heights, and says that the regulations would be “considerate of view corridors and historic buildings throughout the site.”

Affordable Housing – Location and Priorities – The ANC “recommends that the zoning allow location and priorities for affordable housing to best meet the needs and priorities of the citizens of Ward 4...” The proposed zoning would require distribution of affordable housing throughout the Walter Reed site, but would not prohibit certain populations, such as seniors or homeless veterans, to be served in specific locations.

Transportation – Parking – ANC 4A recommends that a parking space be available for every residential unit, and that parking spaces on private streets should not count toward the total parking cap. The zoning proposal would limit the total number of parking spaces at the site to 3,400, in conformance with the guidance of the SAP and Transportation Impact Study. Those spaces are not assigned to any particular use, but it is likely that a significant number would be dedicated by the developer to residential uses. The current zoning proposal would not count parking on private streets toward the parking cap as long as those spaces are open to the public and not reserved for a particular use.

Transportation – Parking – The ANC recommends that the developer be required to provide electric car charging stations, car share parking, and “expanded handicapped parking capacity.” Presently the proposed zoning does not require car charging or car share parking spaces. As given proposed action for approval by the Commission for ZRR parking standards and incorporated into WR, car share spaces would not count toward the overall cap of 3,400 spaces. And based on the ANC’s comment, § 3530.4 has been amended to also exclude from the cap spaces dedicated to the charging of electric vehicles. Please see

Attachment 5 for that edit. Accessible parking spaces would be provide per prescribed ADA ratios.

#### ***6. Prior DMPED Experience Achieving Affordable Housing***

DMPED has provided a memo containing an analysis of past projects and the amount of affordable housing realized through those projects. Please see Attachment 3.

#### ***7. IZ Zoning Text***

Absent any specific direction from the SAP, the Office of Planning proposed standard IZ text in the draft zoning. OP recommends maintaining that zoning language and allowing the District's Land Disposition Agreement to govern higher quantities of affordable housing. The LDA can provide flexibility for the affordable units, and IZ can ensure a geographic distribution of some portion of the LDA-required units.

#### ***8. Exclusive Rights Agreement between DMPED and the Selected Developer***

DMPED has indicated that because of a confidentiality agreement, they cannot provide the Exclusive Rights Agreement to the record.

#### ***9. Parking Assumptions from Small Area Plan Transportation Study***

Attachment 4 is the parking summary from pages 99-100 of the Transportation Impact Study conducted as part of the Base Reuse Plan. The assumptions include parking ratios for different uses.

### **ATTACHMENTS**

1. Aerial View of the Potential Development Massing
2. WR-1 Rowhouse Layout Options
3. DMPED Memo Regarding Affordable Housing
4. Transportation Impact Study Parking Summary
5. Revisions to WR-6 and Parking Text

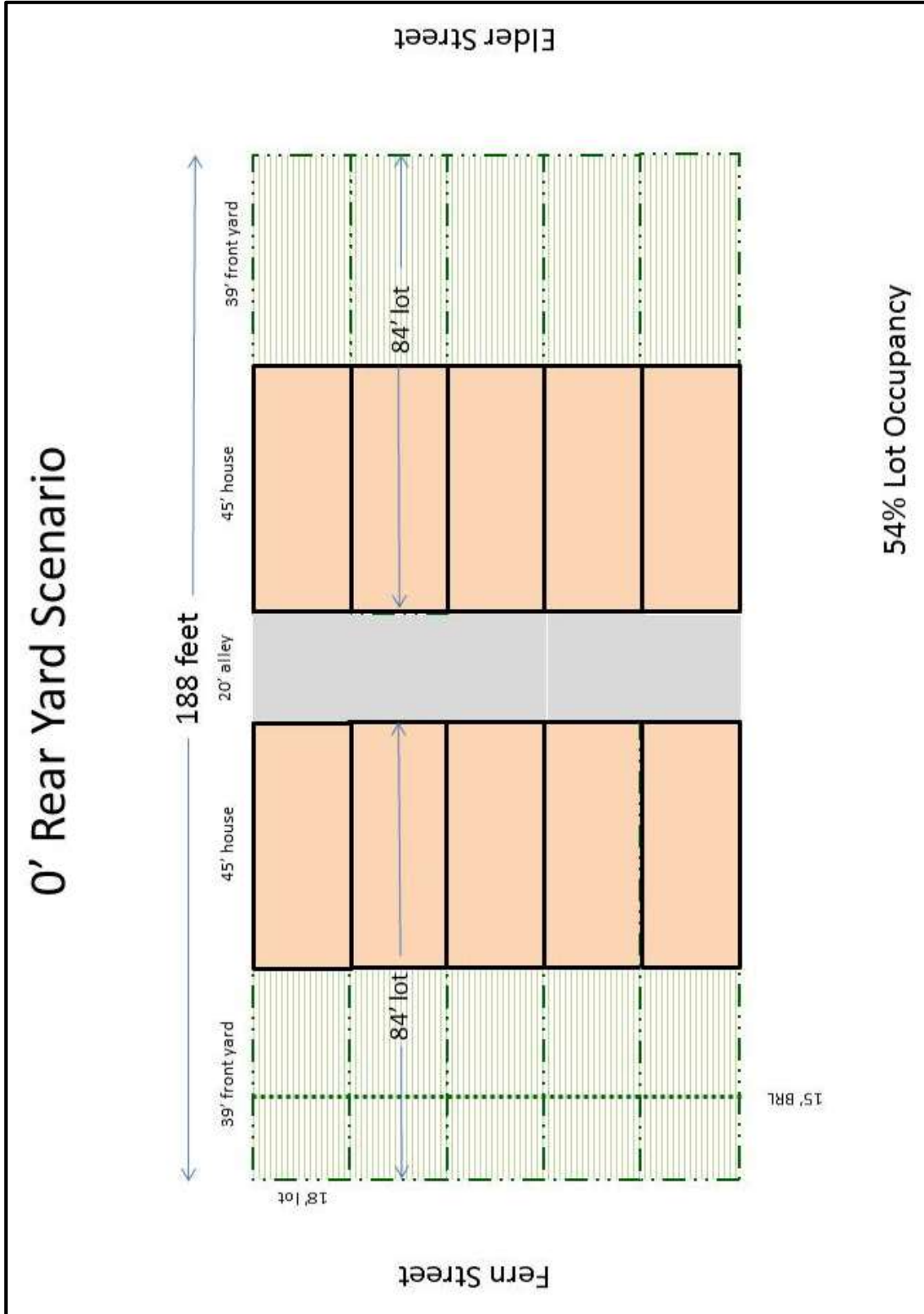
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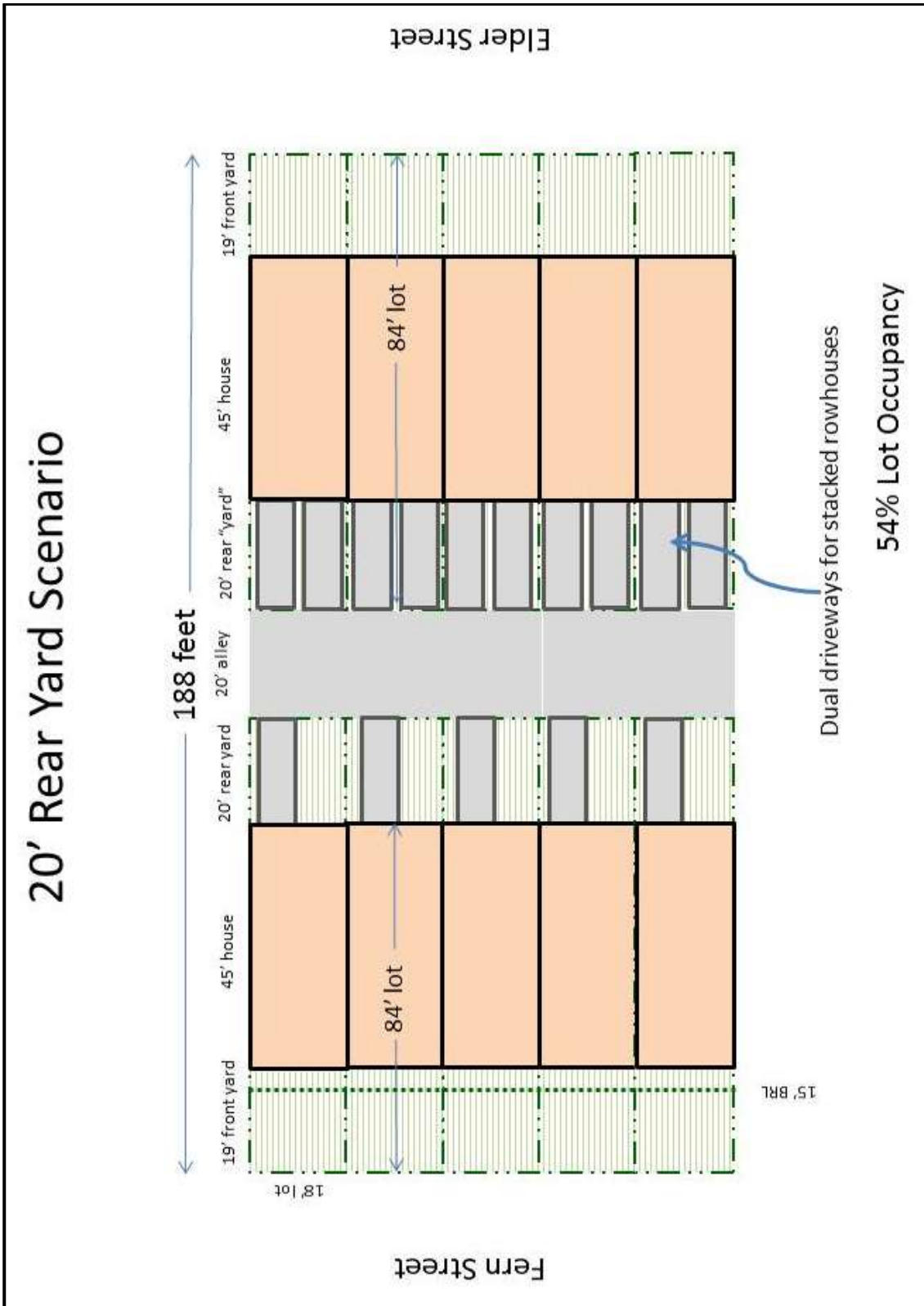


**Attachment 1 – Aerial View of the Potential Development Massing**

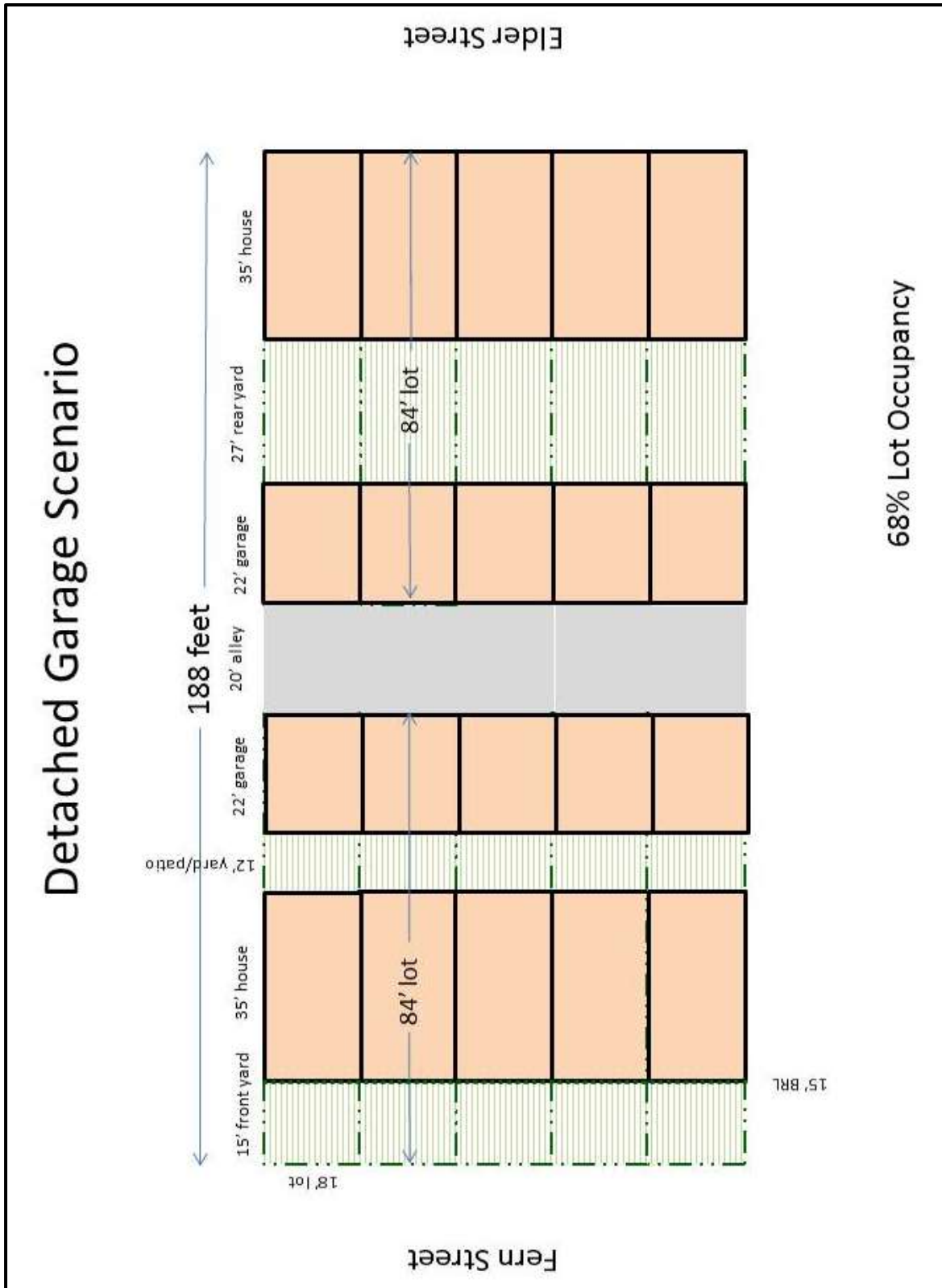


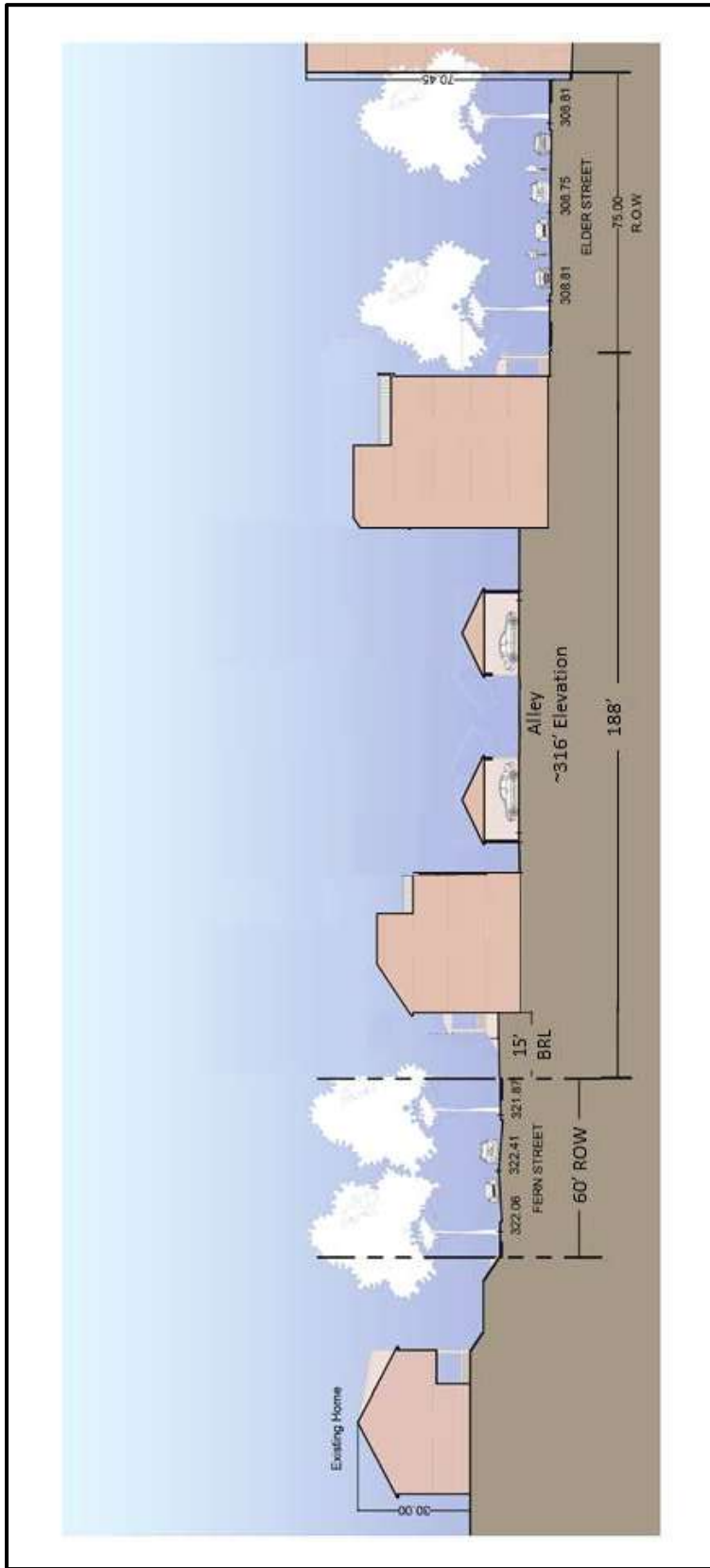
### Attachment 2 – WR-1 Rowhouse Layout Options











### Attachment 3 – DMPED Memo Regarding Affordable Housing

#### Affordable Housing within DMPED's pipeline, 2010-2015

DMPED projects have leveraged a strong mix of affordable housing as it relates to a total project. Between 2010 and 2015, DMPED completed 39 projects that had an affordable housing residential component, including 29 projects that are completed and 10 projects that are under construction. DMPED chose this 5 year timeline to demonstrate a robust history in the District's market – years of downturn followed by an upswing of higher valuation. In total, the 39 projects comprise 2,349 units of new affordable housing units to the market (*Table 1*).

On average, affordable housing- rents or mortgages restricted at 80 percent of the area median income (AMI) or less- make up 32 percent of units across the pipeline that had an affordable housing component since 2010 (*Table 1*). The percentage of affordable units for individual projects varied from 8 percent to 100 percent. Though, it is important to note that many of these projects are single sites and do not account for large-scale site improvements and infrastructure development. The majority of affordable units (29 percent of units) are restricted to residents who earn between 30-60 percent of AMI, 7 percent achieve deeper affordability restricted to residents earning less than 30 percent AMI, and 11 percent are restricted to residents who earn between 60 and 80 percent AMI (*Figure 1*).

The most directly relevant DMPED dispositions - large site dispositions with phased development and significant infrastructure and other costs, include McMillan Sand Filtration Site (20 percent affordable units out of 674 total units), Hill East Phase 1 (30 percent affordable units out of 354 total units), and St. Elizabeths East Campus (77 percent affordable units out of 2,210 total units). Because market rate housing in the St. Elizabeth's neighborhood is close to affordable housing rent restriction rates, this project is able to produce significantly larger number of affordable housing units. These three large site dispositions are still under negotiations, and therefore, not included in this analysis in *Table 1*.

*Table 1. DMPED projects with an affordable housing component that have been completed or are under construction, 2010-2015*

	Affordable Housing Component					Associated Market Rate Units	Total Units
	Total Projects with an affordable housing component	Total Affordable Units	<30% AMI	30%-60% AMI	60%-80% AMI		
Under Construction	10	613	66	272	275	1,918	2,531
Completed	29	1,736	209	1,238	289	2,993	4,729
<b>Total</b>	<b>39</b>	<b>2,349</b>	<b>275</b>	<b>1,510</b>	<b>564</b>	<b>4,911</b>	<b>7,260</b>

*Figure 1. Average Percentage of Income Band Restrictions Compared to the Total Project within the DMPED Portfolio, 2010-2015*



## Attachment 4 – Transportation Impact Study – Parking Summary

### 3.4 Parking Demand

This section summarizes a review of parking supply and demand for the proposed Reuse Plan. First, an examination of potential parking demand is presented, followed by recommendations on how the demand can be accommodated within the site.

In summary, the development proposes a parking supply of 2,300 to 3,400 spaces. This parking range was derived from a shared parking analysis. The parking is consistent with the District’s new parking regulations DCMR 11 - Chapter 15 in that it emphasizes and supports a balanced mix of transit modes, utilizes shared parking methodology to ensure an adequate supply of off-street parking while preventing an over-supply, and provides for ample car-share parking spaces. Parking may be provided in one or more garages per phase with access from internal streets. Exact parking counts, location and number of garage ramps, and below grade layout will be submitted with each individual building application

#### 3.4.1 Parking Demand

Determining the parking demand of individual land uses in an urban environment can be difficult for several reasons, including shared parking and synergy between uses. While working on various projects in the District, Gorove/Slade has observed that parking demand in the District is much lower than national standards for demand. For commercial uses, demand is usually between 25 to 50% of standard and between 40 to 65% of standard for residential uses. Residential uses have a relatively higher demand in urban areas because, while people may take alternate modes to work, they still may own and store a car at home. The range in rates represents areas of the District ranging from typical conditions with some transit and alternate mode use to dense Central Business District (CBD) areas of the District with high quality alternate mode service.

Table 11 summarizes a range of potential parking demand rates, starting with national standards and showing a range of what Gorove/Slade considers ‘Non-CBD’ District rates and ‘CBD’ District rates. Parking ratios for the LAMB and Yu-Ying Schools are based on the available parking area serving the existing building those schools would occupy.

**Table 11: Range of Potential Parking Demand Rates**

Land Use	Standard Parking Demand Rate <sup>10</sup>	Range of Parking Demand Rates Observed in District			
		Non-CBD location		CBD location	
		Percent of Standard	Rate	Percent of Standard	Rate
General Retail	3 spaces / thousand SF <sup>11</sup>	50%	1.5	25%	0.75
Restaurant/Bar	16 spaces / thousand SF	50%	8.0	25%	4.0
Residential	1.4 spaces / dwelling unit <sup>12</sup>	65%	0.90	40%	0.55
Office	2.8 spaces / thousand SF	50%	1.4	25%	0.70
Hotel	1.2 spaces / thousand SF	50%	0.60	25%	0.30
Theatre	0.33 spaces / seats	50%	0.17	25%	0.08

<sup>10</sup> ITE, *Parking Demand*, 4<sup>th</sup> Edition

<sup>11</sup> Highest non-December rate

<sup>12</sup> High-rise apartments



Based on these assumptions and methodologies contained in the Urban Land Institute’s (ULI) *Shared Parking* manual, second edition, Table 12 shows the resulting peak parking demand. Figure 43 shows the resulting parking demand distributed through the proposed site plan.

**Table 12: Projected Parking Demand**

Base Program	Amount	Projected Parking Demand				
		Parking Ratio		Parking Demand		
		High	Low	High	Low	
<u>Residential</u>						
Apartments	1,706 Units	0.7	0.5	1,194	853	
Townhomes	90 Units	1	1	90	90	
<u>Retail</u>						
Neighborhood Retail	271,284 Square Feet	0.003	0.0015	814	407	
<u>Commercial</u>						
General Office	245,800 Square Feet	0.002	0.001	492	246	
Medical Office	56,350 Square Feet	0.003	0.003	169	169	
<u>Institutional</u>						
Building 1	200,000 Square Feet	0.0015	0.001	300	200	
<u>NOI Uses</u>						
Veterans Living (HELP USA)	75 Units	0	0	0	0	
Senior Living (SOME)	25 Units	0	0	0	0	
Howard University (Ambulatory)	50,379 Square Feet	0.001	0.001	50	50	
Howard University (Ambulatory)	65,649 Square Feet	0.003	0.003	197	197	
LAMB and Yu-Ying Schools	148,679 Square Feet	--	--	105	105	
<b>Total</b>				<b>3,411</b>	<b>2,317</b>	

### 3.4.2 Parking Supply

Based on the analysis presented in Table 12, the parking supply of 2,300 to 3,400 spaces identified in the Reuse Plan will be able to accommodate the expected demand. At full-build out of the Reuse Plan, a parking supply of around 2,500 will be appropriate, depending on the exact development program constructed while a supply that is approaching the ratios that arrive at a total supply of 3,411 would be more appropriate during the earlier phases of redevelopment due to the lack of interaction between uses and other non-auto reductions.

Based on these calculations, this report reaches the following conclusions on Reuse Plan parking:

- Parking for the development should be built towards the ultimate goal that the total amount of spaces be around 2,500 spaces, depending on the actual development program;
- To the highest extent possible, parking should be shared across all uses and garages;
- Parking costs should generally be unbundled from leases and condominium purchases to keep residential parking demand to a minimum; and
- Performance pricing measures should be incorporated to help balance demand.

It should be noted that the parking supply outlined above has been designed based on the anticipated zoning of the WRAMC development. While the site is currently not zoned to any specific use or district, these ratios are based on typical parking ratios observed within the District per use.

**Attachment 6**  
**Revisions to WR-6 and Parking Text**

Revision to Allow Kiosks in the WR-6

3506.2 The development standards for the WR-6 zone are set forth in the following table:

<b>WR-6</b>	
<b>Sub-Area</b>	<b>FAR (max.)</b>
Land Bays J.1, J.7, G.2, G.6, and K.4	0

3506.3 In the WR-6 zone no new surface parking lots are permitted.

3506.4 Notwithstanding the restriction of § 3506.2, temporary structures may be erected to house any temporary use, subject to the temporary use provisions of § 3591.6.

3506.5 Notwithstanding the restriction of § 3506.2, up to five permanent structures, of no more than four hundred (400) square feet each, may be constructed for the general purpose of food and beverage sales, or other retail or service use ancillary to the role of the WR-6 as an open space zone. This section shall not imply approval by the Historic Preservation Review Board or any other permitting authority.

Revision to Exclude Car Charging Spaces from the Parking Cap

3530.4 Parking spaces dedicated for use by a car-sharing service or dedicated for the charging of electric vehicles shall not count toward the limit of § 3530.1.