

MEMORANDUM



401 9th Street, NW
Suite 500, North Lobby
Washington, DC 20004
Tel: (202) 482-7200
Fax: (202) 482-7272
www.ncpc.gov

Date: September 16, 2008
To: Travis Parker, District of Columbia Office of Planning
From: Julia Koster, National Capital Planning Commission
Subject: NCPC Staff Comments on the Office of Planning's Recommendations Regarding the Industrial Subject Area

NCPC staff appreciates the opportunity to comment on DCOP's proposed industrial zoning regulations.

The following comments on the July 24th draft are provided by NCPC staff for your consideration. These comments reflect both general planning perspectives and identify specific federal interest issues. These comments have not been approved by official Commission action, and additional comments may be provided in the future, particularly as staff and our Commission have the opportunity to review draft updates.

In addition to NCPC staff comments, we asked the General Services Administration's National Capital Region office to review DCOP's proposed industrial zoning regulations. They responded that the proposed text and policy changes will not have an impact on GSA owned facilities. Their comments are attached for your review.

If you have any questions, please call me at 202-482-7211.

NCPC staff comments are organized under the five recommendations as identified under DCOP's proposed industrial zoning regulations.

1. Industrial districts should be renamed Production, Distribution & Repair.

NCPC staff support the renaming of existing of existing C-M and M zones to PDR and understand that DCOP's recommendation will not alter any of the underlying provisions of the industrial districts.

2. Performance measures should be modernized and coordinated with other city standards.

NCPC staff support the use of performance measures and encourages DCOP to coordinate these with current DDOE standards. NCPC staff also supports DCOP's effort to ensure that performance standards are measurable where possible. NCPC staff encourages DCOP to consider large truck and freight traffic issues in its performance measures (where trucks park, how they get to and from the site, and how trucks are loaded, etc.); as truck and freight traffic could negatively affect the efficient operation of the federal government, including national security operations.

3. PDR uses should be defined by category rather than listed as individual uses.

NCPC staff support DCOP's recommendation to comprehensively define PDR uses as a category, which avoids duplicative, incomplete, or out-of-date lists.

4. The development potential of PDR land should be adjusted to encourage the construction of PDR uses while also permitting the continued development of non-PDR uses as guided by market demand.

In accordance with the findings of the Industrial Land Use Study, NCPC staff concurs that there is a limited and increasingly shrinking supply of PDR land within the District of Columbia. This is of concern of NCPC staff.

Policies within the Federal Workplace Element of *The Comprehensive Plan for the National Capital: Federal Elements* encourage federal agencies to consider the advancement of local economic development goals and business development in surrounding areas as criteria for facility placement; recognizing that spending by federal agencies for supplies and services at private businesses nearby further adds to a jurisdiction's economic activity. In particular, the Small Business Act, as amended, (15 U.S.C. § 631 et seq.) promotes the creation, expansion, or improvement of small businesses by providing the maximum practicable opportunity for the development of small business concerns owned by members of socially and economically disadvantaged groups. It promotes the advancement of such firms through the procurement of goods and

services by the federal government. Many of these firms get their start, and grow and mature within PDR lands. The loss of PDR lands within the District of Columbia may limit the ability of small businesses to locate near and benefit from federal agencies that seek to procure needed goods and services, thus limiting economic development opportunities within the District of Columbia that grow small businesses. In addition, the growing difficulty of PDR land uses to locate within the District of Columbia may limit the ability of federal agencies to efficiently procure needed goods and services within the District of Columbia, and may influence these agencies own locational decisions within the National Capital Region.

In addition, NCPC staff notes that DCOP's recommended text and policy changes do not represent a change in zoning and land-use for federally-owned property and that federally-owned property within the District of Columbia is not subject to local zoning regulations. However, policies within the Federal Workplace Element of the Comprehensive Plan encourage federal agencies to develop sites and buildings consistent with local agencies' zoning and land use policies and development, redevelopment, or conservation objectives, to the maximum extent possible. NCPC staff is concerned that the limited and increasingly shrinking supply of PDR land within the District of Columbia will limit the ability of the federal government to meet the intent of these policies when a federally-owned PDR land use needs to locate within the District of Columbia for operational efficiency. The same concern can be expressed when a federally-leased PDR land use needs to locate within the District of Columbia for operational efficiency.

NCPC staff strongly encourages DCOP to strengthen its recommendation of capping the development potential for non-PDR uses within PDR zones to ensure the availability of land for PDR uses (where conflicts with incompatible land uses can be minimized).

5. Replace existing special exceptions and overlays with uniform buffering standards for all PDR areas.

NCPC staff support DCOP's recommendation to create uniform buffering standards to apply wherever PDR zones abut residential zones.

September 16, 2008

Attachment

Date: September 8, 2008

To Jeffrey Hinkle, NCPC-Community Planner

From: Rodney L. Moulden, Asset Manager-Regional Planning Coordinator

Subject: District of Columbia-Industrial Zoning District Analysis

The General Services Administration has reviewed the request from the National Capital Planning Commission to comment on the following Industrial Zoning District recommendations by the District of Columbia Zoning Office, and Office of Planning.

Recommendations by the District of Columbia Zoning Office, and Office of Planning.

1. Industrial districts should be renamed Production, Distribution & Repair.
2. Performance measures should be modernized and coordinated with other city standards.
3. PDR uses should be defined by category rather than listed as individual uses.
4. The development potential of PDR land should be adjusted to encourage the construction of PDR uses while also permitting the continued development of non-PDR uses as guided by market demand.
5. Replace existing special exceptions and overlays with uniform buffering standards for all PDR areas.

After careful review of the recommendations, GSA has concluded that these text and policy changes do not represent a change in zoning and land-use for federal property, and will not have an impact on GSA owned facilities. Also, GSA understands that federally owned properties in the District of Columbia, are not subject to local zoning regulations. Instead, new design and renovation of federal buildings are regulated by NCPC ("In lieu of zoning policy"), pursuant to the District of Columbia Zoning Enabling Act of 1938 (ch. 534, 52 Stat. 802 and DC ST § 6-641.15).

Thanks for informing GSA about this update and we support your continued collaboration on similar issues.