



# THE HEIGHT MASTER PLAN *for* WASHINGTON, DC

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## Executive Summary

The federal contribution to the joint  
Height Master Plan for Washington, DC  
as requested by the U.S. House Committee  
on Oversight and Government Reform

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Prepared by the  
National Capital Planning Commission  
November 26, 2013



## EXECUTIVE SUMMARY

It has been a privilege for the National Capital Planning Commission (NCPC) to jointly lead the Height Master Plan (Height Plan or Height Study), which explores the future of one of the most significant contributors to the form and character of our nation's capital, the federal Height of Buildings Act (Height Act). The Plan, requested by the Honorable Darrell Issa, Chairman of the U.S. House Committee on Oversight and Government Reform, explores potential strategic changes to the Height Act that both protect national interests and meet important long-term goals for the District of Columbia. Chairman Issa requested a joint study between the NCPC, which includes both federal and District representatives, and the Mayor of the District of Columbia. The District Office of Planning (DCOP) led the effort on behalf of the District.

This year-long study reaffirmed the importance of the Height Act and revealed important findings:

- As the capital of the United States, Washington is a unique place with its own authentic character and identity. For more than a century, the Height Act has played a central role in shaping Washington's unmistakable and symbolic skyline. The Height Act also fosters an open, pedestrian scale that is enjoyed by residents of the District of Columbia, the nation's citizens, and the millions of visitors who come here annually. The form of the capital city is a national trust and a legacy for future generations.
- Washington, DC is one of the great planned capital cities of the world. Since its founding, the U.S. Congress has acted as the steward of the capital city's form, including on matters related to building height. Through the Height Act, Congress has ensured that the image and experience of the capital city reflects the preeminence of our democratic institutions, now and into the future. These actions fulfill the early planning vision for a magnificent capital city, as set forth by our nation's founding fathers.
- The visual modeling work conducted as part of the Height Study demonstrates potential for significant adverse impacts to national resources from increasing building heights, particularly within the L'Enfant City. The Height Act is tightly linked to form, character, and experience of the L'Enfant City, including the views and setting of the U.S. Capitol, the White House, the National Mall, the ceremonial streets and avenues, and many national parks and resources throughout this area. Mindful of the Committee's guidance to proceed carefully within the L'Enfant City,<sup>1</sup> NCPC strongly recommends no changes to the Height Act here.

**Historic L'Enfant City Boundary**



Image: District of Columbia Office of Planning

<sup>1</sup> See letter from Committee Chairman Darrell Issa, dated October 3, 2012 in Appendix A.

**View from the steps of the U.S. Capitol showing the setting provided by the U.S. Capitol Grounds and the National Mall**

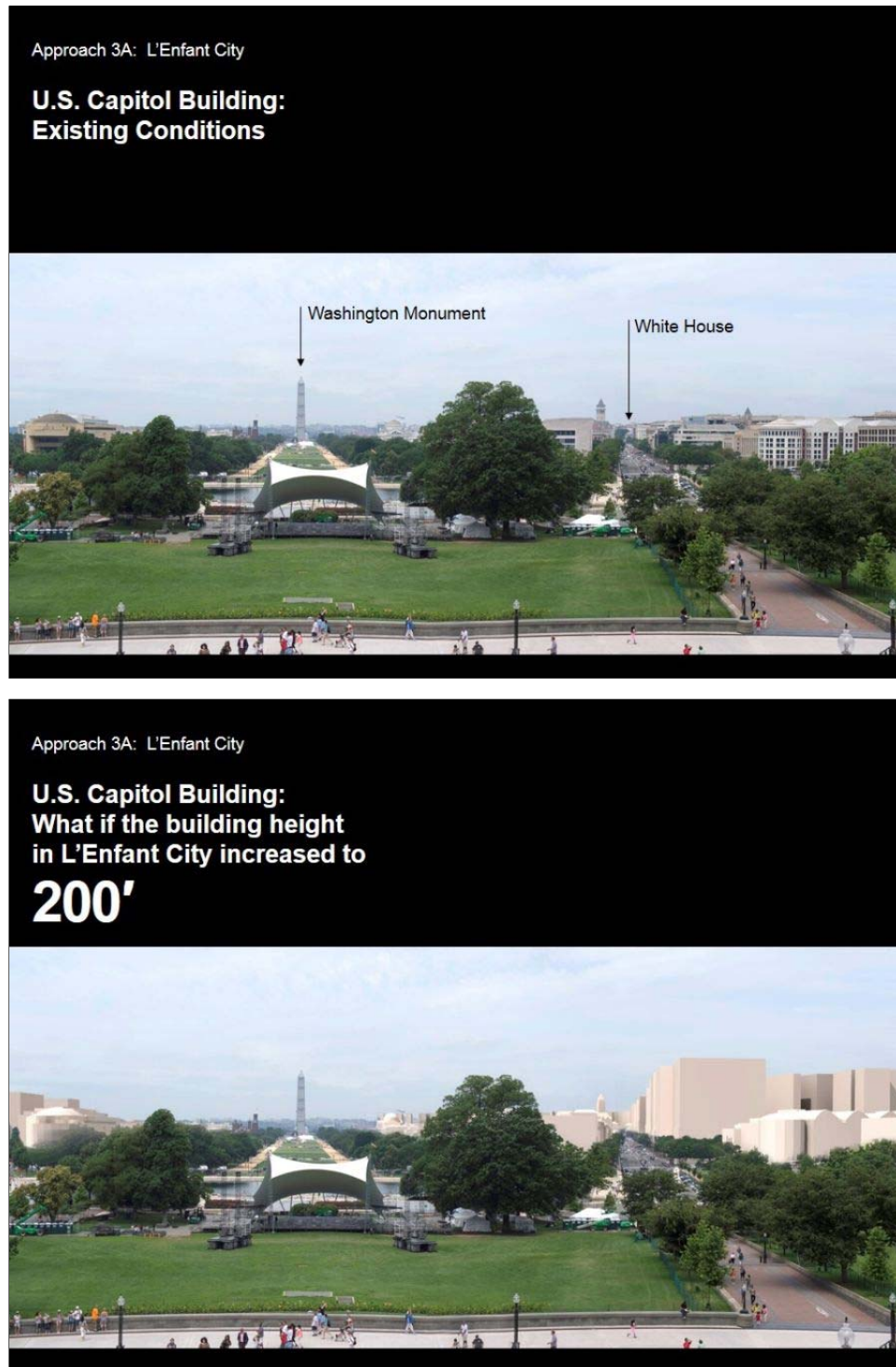


Image: District of Columbia Office of Planning

These 'before and after' images from the District's visual modeling study illustrate the impact of increased building heights on panoramic, skyline and street-level views. The modeling demonstrates potential for significant adverse impacts to national resources, particularly within the L'Enfant City.

## View South on North Capitol Street to the U.S. Capitol



Image: District of Columbia Office of Planning

The District's visual modeling study shows that even increasing building heights to 160' under the ratio proposal begins to diminish the presence of the U.S. Capitol dome.

## View Southeast from Arlington National Cemetery

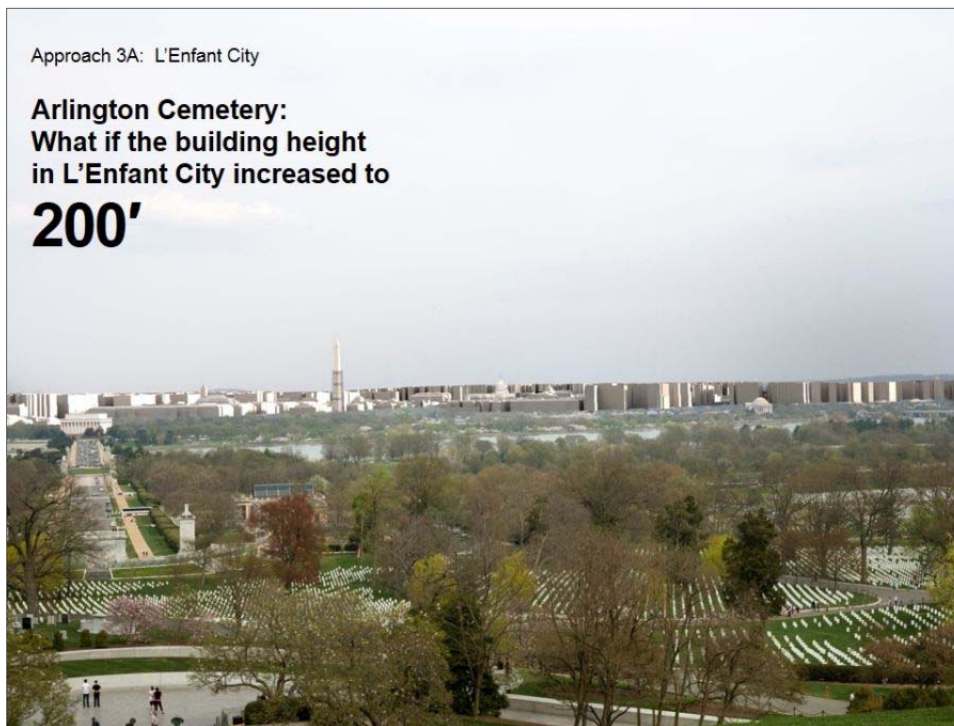
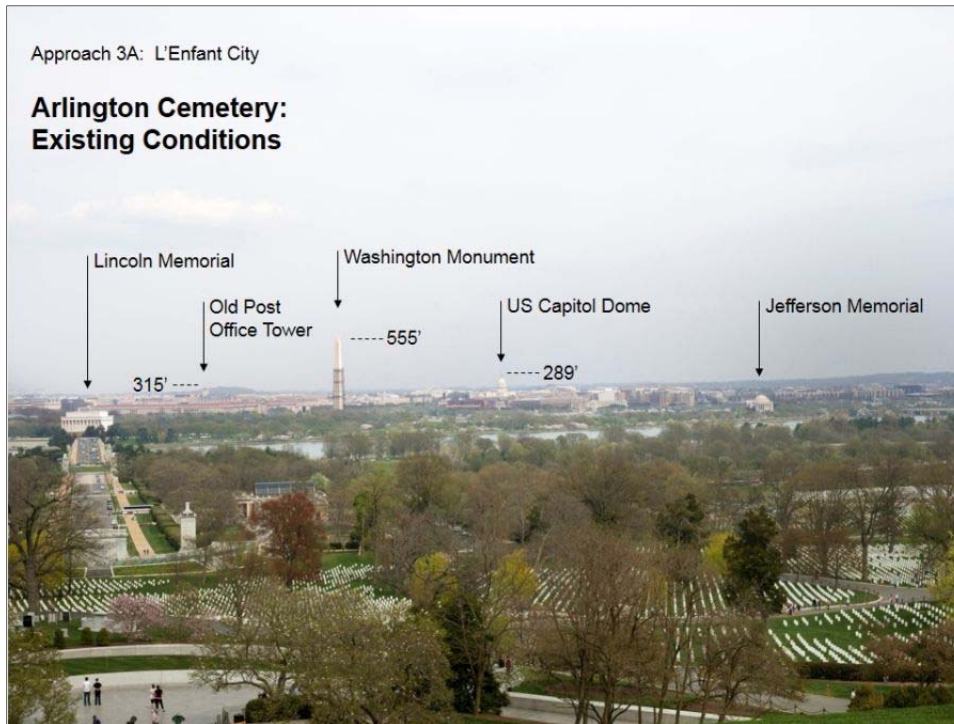


Image: District of Columbia Office of Planning

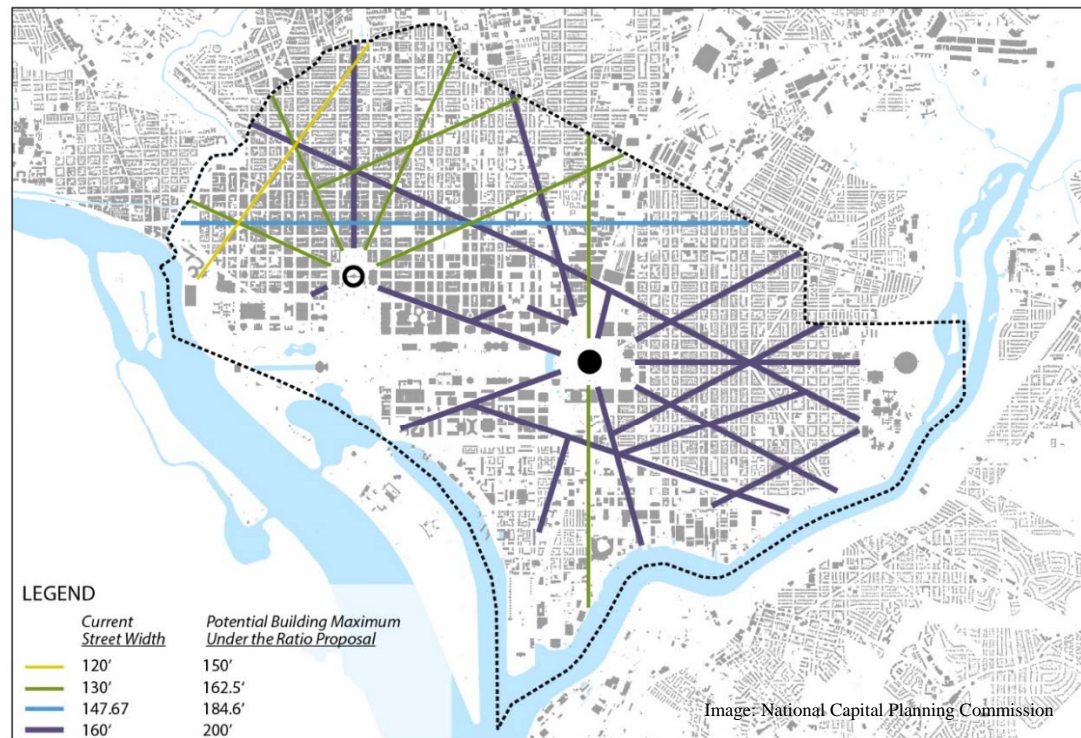
Unobstructed panoramic views of nationally significant structures and symbols is a defining feature of Washington's internationally recognized skyline.

The District, however, targets specific streets and avenues within the L'Enfant City for increased height. Two central reasons NCPC does not support the District's recommendation to implement a ratio proposal within the L'Enfant City are:

1. First, the District's ratio proposal would allow greater height precisely where it is least appropriate, primarily on streets framing views of the U.S. Capitol and the White House. Buildings along these avenues should be scaled in deference to these symbolic structures.

Other streets targeted for increased height under this recommendation are located in the Capitol Hill historic residential neighborhood. The visual modeling studies show potential for adverse impacts to these views and settings under the ratio proposal, which replaces a predictable regulatory framework with a new approach in some of the most nationally significant parts of the city.

#### **District's Ratio Approach: Impacted Streets within the Historic L'Enfant City**



*A map of the streets where building maximums would increase under the Ratio Proposal within the L'Enfant City. Many of these terminate on the U.S. Capitol and White House or are located in the Capitol Hill historic neighborhood.*

2. Second, the District's own analysis shows that most of the city's current capacity to grow is primarily located *outside of* the L'Enfant City. However – unlike its street-specific recommendation within the L'Enfant City – the District is *not* proposing any geographically specific or targeted locations where increased building height would be appropriate outside of the L'Enfant City. As a general principle, the L'Enfant City should not be the first place identified to accommodate future growth through height changes.
- Although many federal interests and national resources are concentrated within the L'Enfant City, there are numerous federal interests outside of the L'Enfant City. Several examples include federal headquarters and facilities, such as Saint Elizabeths; diplomatic areas such as the International Chancery Center; and national parks, such as the Civil War Defenses of Washington and Rock Creek Park. Although these federal resources tend to be less concentrated, they must be protected now and in the future.
  - Upholding the Height Act and meeting the District's goals for growth are not mutually exclusive. Today, the District has development capacity throughout the city within the limits of the Height Act. In other words, local municipal zoning is often more restrictive than the limits under the Height Act and the District has room to grow within the current federal limits.
  - Over the long-term, the Commission believes that there may be opportunities for strategic changes to the Height Act in areas outside of the L'Enfant City where there is less concentration of federal interests. However, the Commission recommends detailed, and joint planning work through the *Comprehensive Plan for the National Capital* prior to proposing any changes to the law. By contrast, the District recommends amending the law today to allow for a process where targeted areas are identified and authorized to exceed the limits under the Height Act outside the L'Enfant City through the *Comprehensive Plan*.

NCPC's recommendation responds to overwhelming public feedback in favor of completing the comprehensive planning prior to considering any amendments to the Height Act in the areas outside of the L'Enfant City. According to public testimony and comments from federal stakeholders, three commonly cited reasons for additional study include:

1. The public viewed the Height Plan as a starting point of future work, and encouraged continued study, public engagement, and the need to thoughtfully tie any alterations in building heights to a fully-vetted future growth strategy.
2. The capacity information and growth forecasts included in the District's Height report have not yet been incorporated into established, city-wide planning guidance, including the District Elements of the *Comprehensive Plan*. The established vetting process associated with an update to the District Elements weighs specific proposals for growth with neighborhood-level implications. Many residents argued that the *Comprehensive Plan* should be updated prior to considering amendments to the Height Act outside of the L'Enfant City.

3. From a federal interest perspective, the current Federal Elements of the *Comprehensive Plan* should also be updated prior to an amendment to the Height Act in the areas outside of the L'Enfant City. The policies in the current Federal Elements do not include specific protections for federal resources that anticipate a change to the Height Act in the areas outside of the L'Enfant City. A future update to the Federal Elements should more clearly protect federal interests on matters related to height.
- NCPC consulted with 17 federal agencies to identify how and whether amending the Height Act would impact federal interests, including mission and operations. A full description of their feedback is located in Part 1 of this report. First, it was generally noted from a federal operational and mission perspective, the Height Act continues to meet the essential interests and needs of the federal government. For example, there is no specific federal interest in raising heights to meet future federal space needs. Like the private market, the federal government's demand for office space is cyclical, and will be affected in the future by changing technology, workplace practices (such as telework and hoteling<sup>2</sup>) and mission needs. In the short term, agencies aim to use existing federal assets more effectively to meet future needs.<sup>3</sup> It was also noted that any uniform increases in the height of buildings near most federal agencies may result in costs associated with new security evaluations, such as assessments of new lines of sight to and from federal facilities.
  - To support more active uses of penthouses, NCPC is recommending amendments related to human occupancy.
  - To ensure that the Height Act is current with modern building regulation, NCPC provides comments and recommendations about specific antiquated provisions related to fire safety.

## Final Recommendations

1. To protect the integrity of the form and character of the nation's capital, the federal Height Act should remain in place and no changes should be made to the formula or approach for calculating allowable building height.
2. There may be some opportunities for strategic change in the areas outside of the L'Enfant City where there is less concentration of federal interests. However, additional study is required to understand whether strategic changes to the Height Act would impact federal interests within this area.
3. The city's most significant viewsheds, to include without limitation, those to and from the U.S. Capitol and the White House, should be further evaluated and federal and local protections established, which include policies in the Federal and District Elements of the *Comprehensive Plan*.

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<sup>2</sup> Hoteling is a management practice of providing office space to employees on an as-needed rather than on the traditional, constantly reserved basis. The goal is to reduce the amount of space required by an organization and to ensure that employees can access office resources and technology when necessary.

<sup>3</sup> For more information, see Section 3 of the Office of Management and Budget Memorandum (OMB) M-12-12, Promoting Efficient Spending to Support Agency Operations, "Freeze the Footprint" policies.

4. Amend the Height Act to allow for human occupancy in existing and future penthouses, with the following restrictions:
  - Include specific protections related to sightlines for select federal buildings including but not limited to, the U.S. Capitol and White House.
  - Support communal recreation space on rooftops by allowing human occupancy in roof structures, where use of those structures is currently restricted under the Height Act to mechanical equipment, so long as the facade of these structures continue to be set back from exterior building walls at a 1:1 ratio.
  - Impose an absolute 20 foot maximum height and a limitation of one story for penthouse structures above the level of the roof, which must contain within all mechanical equipment and elevator, stair and other enclosures, with no additional construction allowed above the penthouse roof for any purpose.
5. Delete Sections 2-4 of the Height Act, as contained at 36 Stat 452, chap 263, sec 2-4 (1910), which solely relate to fireproof construction. These proposed deletions are antiquated fire and safety requirements that have been updated and incorporated into modern day codes by the District of Columbia.