

Height Master Plan for Washington, DC

PHASE 2

# COMPILED PUBLIC COMMENTS

SATURDAY, AUGUST 3, 2013 | TENLEY-FRIENDSHIP LIBRARY

## WORKBOOK COMMENTS

Staff did their best to transcribe all handwritten comments. Originals are available upon request at the offices of the National Capital Planning Commission.

**Robert Jack**

**Approach 3:** Seems like a good compromise.

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**Sue Hemberger | Friendship Heights, DC**

**Approach 1:** The best option at this time is no height increase. We're still trying to grow out and that will be harder to accomplish if going up (rather than out) is an alternative. Also, it's clear that current zoning doesn't use the full heights authorized by the Height Act. The Height Act isn't the current constraint, so there's no need to change it.

**Approach 2:** Our experience of the city's walkability is a function not of the ratio but of the built environment. To the extent that the ratio hasn't been "fully realized," it doesn't follow that raising heights to match the ratio will lead to increased walkability. More likely, walkability will be decreased as we lose human scale. Taller buildings don't enhance walkability.

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**Sherrie Berger | Mt. Pleasant, DC**

**Approach 1A:** Yes

**Approach 1B:** No

**Approach 2:** Not sure what else means usually and where!

**Approach 4:** NO.

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**Jay Smith | Friendship Heights, DC**

**Approach 1:** The best choice is clearly to maintain the existing Height Act, option 1A. The study completely fails to demonstrate any need to remove the limit, or any benefit. If it were true that there is additional demand for office or residential space, there is no reason it cannot be accommodated within current limits.

**Approach 2:** This approach is misleading, because the term "reinforce" suggests no change. But as described in the presentation, this means an increase in the height limit. The so-called "relationship" that is provided is no magic formula that is inherently a good result. This is phrased to sound like a modest change, but it is substantial.

**Approach 3:** None of these proposals (3A, 3B, 3C) has been shown to be necessary or to offer any real benefit. The study assumes, and does not demonstrate, that there is a need for additional office or residential space. There is plenty of capacity for many decades to come across the city as a whole. The proposal to lift the height act would eliminate protection for the city that currently prevents unnecessary and unattractive vertical development.

**Approach 4:** This is obviously not an option.

**Economic Feasibility Analysis:** The economic feasibility analysis is poorly done, as it assume, rather than demonstrates, that there is a need for additional office and residential development that can only be satisfied by lifting the height limit. The study also ignores the costs to the residents of DC of the infrastructure (transportation, emergency, sewage, etc.) of the proposed vertical development. To call this an "economic" analysis is misleading, as it assumes benefits, ignores costs, and fails to look at alternatives.

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***George Clark | Forest Hills, DC***

**Approach 1:** Raising height will not make any increased housing more affordable by your own consultants' estimates. Issa's letter is not a Congressional request—if it were even a committee request ranking minority member Cummings would have signed the letter. This is an Issa request only—what are his motivations? As you know, when the Height of Buildings Act was passed, the House debate included extensive discussion about aesthetics, especially light and air, not just fire. Please don't try to mislead us on this.

**Economic Feasibility Analysis:** 1-2% greater share of office is speculation and w/o the margin of error of any study. Assumption of lower office rents requires overbuilding—do we want that? Do we want more Class A office buildings filled with non-tax paying commuters who we have to figure out how to get in and out of the city with our congestions? And we manage to constantly give away the potential new real estate taxes with TIFs and other unnecessary benefits for developers

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***Susan Kimmel | Tenleytown, DC***

**Approach 3:** Unless DC can increase density of both residential and office space, the long-term consequence will cause it to lose out economically and further degrade the environment in terms of air quality. There needs to be more affordable housing and office space close in to avoid increasing commuting distances. We need long term (100 year) studies! Also, I am concerned that a 225 ft height limit would result in more boxy structure such as along K St. rather than elegant skyscrapers as seen in many American and foreign cities (London, Paris, Shanghai).

## GENERAL SESSION QUESTION & COMMENTS

The following summarizes questions asked at the August 3 meeting. All responses were provided by Harriet Tregoning, Director, DC Office of Planning, unless otherwise noted.

Q: If we raise the Height Act, are changes going to happen immediately?

A: No, because the heights of buildings is further limited by local zoning. The Height Act is a federal law; in order for changes to happen, we would have to start with the Height Act, go through the Comprehensive Plan, and then make zoning changes.

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Q: According to AAA, we are one of the top commuter traffic jam cities. If we were to increase density, it would be interesting to see how bad it would be to get to work. I think increasing heights would affect how Metro would run and how much more traffic there would be.

A: Infrastructure is a good point, and it's not just Metro and roads—there's water and sewer, there's gas and electricity. All these things need to be considered if and when we have increases. We have 500,000 people who come into the city every day and leave when work is over. One possibility is that if we have more residential, we would be able to capture more people who work in the city to live in the city.

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Q: I like the approach number 3, the illustrative clusters. However, in my neighborhood, we have a cell phone tower that's over 200 feet. Your images show these blocks on various heights—you should show more architecturally interesting buildings, like narrow ones in Chicago, especially in the area clusters, and to have Walter Reed as one of the illustrative clusters.

A: There's the possibility of increasing height but not changing the FAR, which would result in more slender buildings. Given the time constraints of the study as requested by Congress, we didn't have time to do detailed architectural renderings, although between now and the final recommendations that's a possibility.

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Q: Something in one of the earlier slides on L'Enfant's vision mentioned something about the trees along the street. When you increase building height you cut light, and I didn't see that consideration: the impact on the trees and natural environment.

A: We did do a few light studies, although we ended up looking at a couple of pretty modest heights. We didn't identify a lot of impact on the tree canopy. [Note: a select set of the model images, including images for F Street NW, show shadows at different times of the day.]

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Q: When we look at the topographic bowl and development in Rosslyn that broke through the height, there was a great concern about tree height. What strikes you now about the city is the greenness. On all of the massings, that's what gets wiped out: the tree cover. I can't think of any of the areas in Maryland and Virginia with higher heights that are beautiful places to go. The Height Act has been a very important factor in making this a livable, walkable, beautiful city. We should look at how to get development throughout the city and not destroy what makes this city a beautiful one. Jane Jacobs has a concept on making denser cities out of low-rise buildings instead of high rise ones.

A: You raise the very kinds of issues that we would be considering locally, although with the Height Master Plan we're not trying to do federally what would normally be done locally.

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We should take some infrastructure to the areas of the city that are crying out for development and not just focus on transit area. One that comes to mind is the National Mall.

- Q: I appreciate the visuals that this study produced; they are helpful, but none of them show the effect of the man on the street. This is a democracy, and the scale of the city is a reflection of the importance of the individual. There are also no shadow studies, as all of these were taken at daytime.
- A: We actually have a lot of street views and a few shadow studies, although they weren't included in this presentation in the interest of time. All visual models are available at: <http://www.ncpc.gov/heightstudy/modelindex.html>, and can be sorted to show street level images.
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- Q: It would be interesting to further the study of government-owned land, with eminent domain issues. The federal interest is important; there is a lot of government-owned property, and developer interests (e.g. the Old Post Office building).
- A: The trend in the federal government is as you've indicated: occupying less space, which results in a little less need for federal buildings.
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- Q: I really care about this city as it should be for the future, but there is a lot of the past well worth keeping. The economic study seems to be done from the perspective of developers by people who represent developers. Infrastructurally, I'm not sure that we have a sewer system that could handle adding more people, as well as our transit system. Also, I think we need an additional fourth principle: to improve the city for the residents as well as the workers.
- A: These issues often get pulled altogether, and while we are delighted to hear about them now, they're not really in the scope of the study. If the Height Act changed now, not a single thing in the city would change until we had a robust conversation locally, and then we could talk about strategic solutions (for example, having a "beauty contest").
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- Q: I know that Chairman Issa asked for the consideration of the L'Enfant plan and of the federal interest. The federal interest included areas like Old Soldier's Home, Fort Reno, etc. so why are Fort Circle Parks not part of the federal interest?
- A: When NCPC reviews these models and the analysis, these are the sorts of things the Commission will point out and make comments on what areas need to be protected. This is part of the discussion that will occur soon, and we have to look at the same models to understand what these impacts are.
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- Q: If you were to take the images of all the approaches except of the third one, you're always going to have a reaction when you see the brown blocks, a lot of which is unfortunately due to the visual process. If you could create something that could emphasize the quality of the buildings, like the London models, I think that would really help a lot.
- A: That's actually the very kind of comment that would be useful as we see where we want to take this as we go forward. To an extent, we almost wanted people to see the worst case scenario of these modeling so people would know we weren't trying to mask the effect of heights.
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- Q: You started the presentation saying that the Height Act has helped spread economic development throughout the city, which is a positive thing. That principle seems to get lost as we have a conversation about changing the Act. How does that apply for the future? Also Chairman Issa specifically asked for a study of changes that are compatible with the neighborhoods.
- A: The way we considered the effects with neighborhoods is we took off the table most of the city, areas that are not designated for growth or transit centers etc. Additionally, implementation of this would probably be selective and over time, because if you suddenly flooded the real estate market it would have negative impacts.

- Q: I just wanted to clarify: you referred to in some of your drawings of the interactions of current zoning restrictions with the Height Act. It would be helpful to see what you're recommending, especially because we're currently going through zoning rewrites.
- A: An important point that you raised is that we're not making changes to height in the zoning rewrite. Our comp plan has designated areas that are high-density, and we're not making any changes beyond what the comp plan says. The zoning plan went to the Commission last month, but it doesn't talk about what we're studying here. Those changes might involve another round of zoning changes, and could depend on pressures like demand and absorption.
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I'd like to go back to the point that the study principles of the Height Act don't mention the interests of the neighborhoods. Washington, DC is the nation's capital, but comprised of small, southern neighborhoods. Some parts of the city have gotten a lot of public investment, and a lot of others haven't. Even now the infrastructure throughout the east of the river is substandard, and it's a big impairment to having adequate facilities. If the Height Act is increased, it'll set off a wave of speculation. The city's investments are going to follow the wave of speculation, there will be tremendous pressure to rezone immediately, and once again we're going to starve parts of the city of the resources they need.

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- Q: One of the things I'm finding a little difficult to discern from the models is, if we had no change in the federal Height Act but changed the zoning code, what would that result in? Before we tinker around with a hundred-year-old law that has served us well, it would be useful to understand what could be done before then.
- A: We'd rather look at tinkering with height at places with density already designated rather than having to pull up all the residential areas in order to accommodate growth and build out the entire city to the same height.
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- Q: Where is this coming from? Did the city work with Congressman Issa to request study on the Height Act, or did he request this independently? Also, I don't see any benefit to change it at all.
- A: No, we didn't go in to the original hearing thinking remotely that we would be requested to do this study. We haven't taken any position on this study, nor has the Mayor. He hasn't even been briefed on it yet.
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- Q: When you say the region is growing, what are you basing that off of? Especially if the federal government is downsizing.
- A: We'd like to think that the transportation investments and other strategic changes are making this place more attractive. Even as the federal government downsizes, we are more than replacing that with the private sector and a more diversified economy. We have a range of estimates about our growth, and we're about to bump it up again for the next 40 years.
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- Q: Could you tell us a little more about the implications of the penthouse issue?
- A: The very minor change that was being contemplated in the hearing was whether the penthouses should be allowed to be used for something other than mechanicals, because they are already there. The Height Master Plan grew out of this initial consideration of penthouses.