I have lived and worked in Washington, DC for over 40 years and oppose any changes in the Federal Height of Buildings Act of 1910.

Washington, D.C. is not only the nation’s capital, it is a beautiful and livable city due in no small part to the limitations contained in the Federal Height of Buildings Act of 1910 (Height Act). In fact, the result has been quite brilliant—likely way beyond what it’s passage over 100 years ago might have anticipated. It has made our city the bright, airy, tree filled, human scaled, and admired place it is. Certainly the unique shape and character of the city resulting from the Height Act has much to do with the city’s current success.

I am horrified to think of buildings the height of those in Roslyn, Crystal City, Bethesda, and Tysons Corner appearing in Washington, dwarfing our monuments to democracy and turning our streets into canyons. There is a strong Federal interest in keeping Washington “approachable” for citizens. Visitors often comment favorably on the beauty, green spaces, light, and human scale of the city.

Washington, DC is a unique city in a sea of look-alike big cities. As the capital of the United States, the National Capital Planning Commission (and the Congress) should have a strong Federal interest in keeping it distinctive, attractive, and approachable. I have visited many other cities around the world and the places I most enjoyed being were the ones with a human scale and a built environment that had ties to its past—Copenhagen, Amsterdam, St. Petersburg, Rome, Prague, Edinburgh and Washington, DC, to name just a few. These are special places that help define the character of their countries for their citizens and for people from around the world. The changes proposed in Office of Planning’s (OP) recommendations would radically change the character of Washington, DC—something widely praised by both visitors and residents.

I was surprised and appalled by the OP’s analysis and recommendations (that among other things would allow heights of up to 200 feet in the L’Enfant city) not just because they were so radically different from those of the National Capital Planning Commission’s (NCPC) (the partner they were to have developed consensus recommendations with), but also because the recommendations completely ignored the three guiding principles mutually agreed upon by OP and NCPC and because the recommendations were so poorly supported by evidence of need or benefit.
Even a cursory consideration of the principles would suggest more restraint in the L’Enfant city:

- Ensure the prominence of federal landmarks and monuments by preserving their views and setting;
- Maintain the horizontality of the monumental city skyline; and
- Minimize negative impacts to significant historic resources, including the L’Enfant Plan.

By suggesting the possibility of heights of up to 200 feet in the L’Enfant city that is filled with historic districts, buildings, monuments and important open spaces and boulevards, OP’s recommendations have ignored these principles.

Their recommendations are more the product of development-oriented planning than a considered evaluation of the costs and benefits. There is no evidence that increasing height will enhance or accelerate economic development. Neither is there any demonstrable correlation between taller buildings and lower rents, witness New York, San Francisco and, closer to home, Roslyn. So why believe that taller buildings will make housing more affordable? For that matter, is there any evidence that middle class or affordable housing families want to live in high-rise buildings? On the other hand, there is plenty of evidence that developers want to build the tallest buildings with the best views. With the new configuration of downtown in the zoning rewrite, this is likely to mean maximally tall buildings along the Mall, waterfront, and with a view of the Capitol building. This will significantly impact the views from these places and from places behind those tall buildings. Such a result would be antithetical to the desire to have significant buildings and memorials stand out on the skyline and to have places like the National Cathedral stand out on the edge of the topographic bowl.

Similarly, the concerns about infrastructure and congestion are dismissed by the Office of Planning’s report saying that increased revenues can be used to improve the infrastructure and address congestion. But those kinds of improvements are not quickly accomplished and would not be logically funded on a piecemeal basis as new buildings are built. Increased height and density are likely to increase congestion. In addition, Metro is at capacity and other infrastructure is not there to support the increased density either. Actions to address infrastructure needs and congestion need to be taken in preparation for increased development; they are not conditions to be
“tolerated” over the many years that would be required to accomplish them. Simply, put: OPs recommendations are a “solution” without foundation and a “solution” for a problem that doesn’t exist.

Happily, the population of Washington, DC is growing after many years of decline. Nevertheless, even the most optimistic and aggressive projections do not suggest that we will reach previous resident levels for many years to come. The city is enjoying an economic and development boom and has recently had budget surpluses. The current reality undermines the assumption that we need to increase the tax base by adding more stories. Similarly, the limited scope of the undeveloped land analysis undermines the conclusion that we are running out of developable land. Further, DC is not an island nation and should not be looked at in isolation. We are located in a metropolitan area with increasingly dense development taking place around us. This trend is healthy both for the city and for the region. All growth does not have to happen within DC’s boundaries.

Despite OPs attempts to sell its recommendations on economics riddled with faulty assumptions and questionable projections, the decision about whether to allow an increase in the height of DC buildings should be fundamentally a judgment about aesthetics and character.

With the proposed changes in downtown contained in the zoning revisions and the recommendations in the Office of Planning’s Height Act report (both of which should be looked at together), height would not be directed outside the central city. It would allow buildings up to 200 feet in the new downtown that is part of the L’Enfant City. This is likely to mean maximally tall buildings along the Mall, waterfront, and with a view of the Capitol building. Tall new buildings would significantly impact the views from these places and from the places behind those buildings.

I am strongly opposed to any change in the Height of Buildings Act and believe that the Office of Planning/Mayor’s recommendations are irresponsible, an unwarranted gift to developers, and a blatant disregard for the well-being of citizens and neighborhoods and the distinctive character of Washington, DC. In addition, I object to the Mayor directly submitting recommendations to Congressman Issa with no public review and comment, including the DC City Council, or any coordination with their “partner”, NCPC, especially since the study was supposed to result in consensus recommendations. NCPC has presented a cogent and well-reasoned