

**Comments on the Height Master Plan for the District of Columbia
“Evaluation and Draft Recommendations”
by the National Coalition to Save Our Mall**

November 11, 2013

The National Coalition to Save Our Mall (Coalition), a 13-year-old non-profit citizen’s organization working to safeguard and enhance the National Mall as a symbol of American founding ideas and stage for our evolving Democracy, welcomes this opportunity to comment on the DC Office of Planning’s “Evaluation and Draft Recommendations” Report for a Height Master Plan. We have previously commented on the National Capital Planning Commission’s “Federal Interest Report and Findings.”

In short, we are concerned that the report falls short in analyzing and considering the impacts of relaxing the height limits that have preserved the character of the nation’s Capital for several generations. More fundamental, the report fails to make the case that changing the Height Act is necessary to accomplish OP’s goals for future growth.

The Height Act together with the historic L’Enfant and McMillan Plans for Washington, D.C. are a primary reason the planning of the Nation’s Capital has been so successful. The importance of the Height Act in protecting our Capital’s planning heritage was not fully understood until Washington developed as an urban center, particularly after the Second World War. Today, taken together, the Height Act and the two historic plans make us what we are. **The Coalition has a significant concern about changes to height limits that would damage the character of the National Mall and other capital historic landmarks, parks and open spaces, major avenues, and other special places that form an essential part of the Capital city.**

Specifically:

- **The Coalition finds that the Report is fundamentally biased due to its predetermined conclusion that the building height increases recommended are in the District and Federal interest.** (DCOP has no jurisdiction over federal interest findings)
- The DCOP’s and its Consultant’s studies undertaken to date, are inadequate to come to the above conclusion due the NCPC Report finding (page 24) **“the conceptual nature of the visual modeling is insufficient to make specific recommendations”**. We strongly agree
- We also agree with the NCPC finding (page 24 NCPC Report) that the DCOP current modeling study is **“limited to conceptual massing studies. It is not a comprehensive picture of how height increases may permanently ALTER Washington’s streets, views and public spaces”**. An existing example is the western skyline backdrop to the Lincoln Memorial and the adverse impact of the tallest buildings in Rosslyn Va. on the viewing of that national memorial from the National Mall and the grounds of the Capitol. Another example, impacts on views from the various bridges into the City.
- The DCOP Report is based on economic considerations, (tax revenues) and the consultant analysis which “are intended to help us understand how private property owners & developers make decisions about expanding capacity” (Page 14). The Report does indicate

that there are current zoned locations that can be built to higher heights, still in keeping with the 1910 Height Act, but that a market **will exist in the future for even more building capacity**. DCOP does not indicate the total capacity or need for the entire City. Page 6 also indicates “Washington still has some opportunities to create new mixed-income neighborhoods around the city...”

- We believe this DC economic approach should not drive the development engine but that DCOP should be planning for the public needs of the current and future DC population, not the financial enhancement of development by the loss of the historic character of the City.
- The basic approach of the Report is to “examine the processes in place that will allow the federal interest to continue to be protected, including the Comprehensive Plan revisions that need to be submitted to (NCPC and) Congress for approval and the eventual zoning changes that need to be approved by a Zoning Commission where 2 of 5 members are federally appointed.” The Report does not objectively substantiate the basic approach due to lack of any existing Comprehensive Plan policy advocating an increase in the height of buildings beyond that limit set in the 1910 Height Act.
- In our opinion raising the height of buildings, anywhere in the City, beyond the current limit(s) would change the historic character of the National Capital. Any serious discussion of potential changes to the Height Act can only take place when Congress, DC officials, federal agencies, and the public have quality data, modeling, and objective analysis. That information, however, is not provided in the “Evaluation and Draft Recommendations.”
- Testimony during the October 28, 2013 DC Council public hearing on DCOP’s report suggests that OP is staking out a position substantially at odds with community sentiment. Comments and questions by Councilmembers and by nonprofit groups, ANCs, and DC residents strongly challenged the report’s economic analysis and recommendations and the lack of public input in shaping the recommendations.

Submitted by:

Judy Scott Feldman, PhD
Chair

George H.F. Oberlander, AICP
Vice Chair


