



Ward3Vision Support for the Comprehensive Plan Amendments

Ward3Vision is a group of residents who are working to make our neighborhoods even better urban places - more walkable, sustainable, and vibrant. We want a D.C. that grows in ways that are environmentally and socially responsible, positive, and equitable, enhancing our neighborhoods and the vitality of our commercial corridors.

Ward 3 Vision strongly urges the Council of the District of Columbia to swiftly adopt the update to the [Comprehensive Plan](#) as submitted by the Office of Planning (OP). After [four years of extensive public engagement](#) this update furthers the goals of equity, inclusiveness and sustainability in how growth in the District of Columbia will occur. These amendments allow for implementation of the goals set forth in the [Housing Framework For Equity and Growth](#) as well as the stated aims of both the [Council](#) and [Mayor](#) to address our current housing crisis by producing 1,990 affordable units in Rock Creek West by 2025.

Current Circumstances Create an Urgency to Proceed

The timely adoption of these measures is critically important to the District in this time of public health, economic crises and urgent demands for social justice, all of which call for swift action to meet our shared social equity goals. [Land use](#) is not the only driver of inequality, but it is such a significant one that gives urgency to the District's efforts to change its approach to land use in affluent areas, including Rock Creek West. These revisions will help guide the District on a sustainable and equitable path to recovery adjusting how and where the District should grow and increasing housing affordability and diversity in our high opportunity neighborhoods and mixed-use transit corridors. To accomplish these goals the Comprehensive Plan amendments include changes to the [Future Land Use Map](#) (FLUM), [Generalized Policy Map](#), [Rock Creek West Area Element](#) and [Housing Element](#) that are consistent with Ward3Vision's mission to create a more walkable, sustainable and vibrant community. The amendments will encourage new housing options for residents of Ward 3 and elsewhere. It will also create opportunities for more affordable housing, through mechanisms like Inclusionary Zoning (IZ).

The Comprehensive Plan¹ is a long-term document that not only addresses how the District will grow, but how it can become more resilient beyond any particular era or economic cycle, as laid out in the [COVID-19 Crosswalk](#). The disparity in the impact of the pandemic on communities of color highlights the interrelationships between the social, economic, and housing elements of the plan and underscores the urgency of its implementation. The importance of the underlying principles -- equity, opportunity and prosperity - are heightened by the pandemic. This crisis has disproportionately affected less prosperous sectors of the city. The inadequate housing stock, especially affordable housing, and resultant crowding in many neighborhoods is something that the Comprehensive Plan amendments begin to address.

The COVID 19 crisis thus makes it more important to proceed now with adopting the proposed changes to the Comprehensive Plan and is not an excuse for delay.² Such suggestions for inaction are merely calls for maintaining the *status quo*.

The Changes are Modest Reforms

The proposed changes to the FLUM and other parts of the Comprehensive Plan in the Rock Creek West area element are modest reforms and far from radical revisions. They are nonetheless significant, creating higher intensity land use in Ward 3 at Metro and along transit and commercial corridors including Wisconsin, Connecticut and Massachusetts Avenues. These changes to the FLUM support modest increases in Residential and Commercial density in Woodley Park, Cleveland Park, Van Ness and Tenleytown. At Friendship Heights the changes better match land use on the Maryland side, allowing flexibility for redevelopment of the Friendship Heights bus garage. All these changes support the location of jobs and new homes near transit.

Other changes support higher intensity mixed use designations along neighborhood retail corridors such as Cathedral Commons, the Spring Valley Shopping Center, Chevy Chase and Forest Hills along Connecticut Avenue, all adjacent to bus lines that provide frequent service.³ These changes could allow for a significant number of new homes and increased housing options mixed with commercial space to be built in some of the most [exclusive and affluent](#)

¹ We also urge that, in the future, comprehensive planning efforts should be done at regularly scheduled intervals that are legally prescribed, incorporating new data and continuing to guide development in a timely manner. This should include well defined parameters to start and end dates for comprehensive rewrites of both the Comprehensive Plan and Zoning Code as well as a time limit for legislative approval.

² See, [Letter from Committee of 100](#) to Chairman Mendelson and the DC Council, May 15, 2020.

³ Chevy Chase with L1/2 & E4/6, Forest Hills L1/L2 & M4, Wisconsin Ave 30N+S/31/33/96/H4, Mass Ave with N4/6 and the AU Shuttle.

[areas](#) in the District. Notably, this potential development in Ward 3 can occur with little if any displacement of low-cost housing.

Given the changing face of retail, many shops have suffered economically and will only thrive if there is sufficient foot-traffic from an increased number of local residents. Greater diversity of residents (age, income, race) will also support a more varied choice of commercial establishments adding vibrancy to our neighborhoods.

The full list of amendments recommended for up-FLUMing can be viewed on this [interactive map](#) and further comments on individual proposals can be found in the [Appendix](#).

The [Generalized Policy Map](#) reinforces that the revisions are modest changes to land use designations with only two amendments within Rock Creek West, one on land owned by Howard University Law School and the other at the Lisner-Louise-Dickson-Hurt Home.⁴ Almost all the other proposed changes for Rock Creek West are slated to occur on the 13% of land already zoned for multi-family housing. Only two minor modifications to Residential Low Density designations in Rock Creek West are proposed and they are now covered by surface parking and unimproved land between Garrison and Harrison Streets within a block of Wisconsin Ave.

The Rock Creek West Area Element Needs to be Updated

Ward3Vision lauds the proposed changes to the [Rock Creek West Area Element](#) that strips much of the exclusionary language from existing Comprehensive Plan and highlights the racial, social, and economic inequities that are reflected in income and home prices. We believe that the proposed changes to the Comprehensive Plan, Zoning, and Housing Policies will start to resolve these entrenched problems.

We would welcome more technical fixes throughout the document, particularly regarding the details of affordable housing, bicycle and pedestrian improvements, deemphasizing “Level of Service” for vehicular traffic and highlighting the struggles that local businesses face.

While we do not agree with all of the assertions in this portion of the document, it is a major improvement over previous iterations and should be approved, so that it can be implemented.

Update of the Housing Element Is Particularly Important

⁴ Exceptions to this are two Institutional Land Use changes for Howard University with amendment 2352 & amendment 9969 at the Lisner Home that facilitate the expansion of residential density at the Howard site and a small increase in commercial uses at the Lisner site.

Ward3Vision supports the update to the [Housing Element](#) of the Comprehensive Plan which describes the importance of housing to neighborhood quality and the importance of increasing housing opportunities for all segments of the population throughout DC.

The District remains attractive to higher-income households, so there is a low inventory of homes which puts upward pressure on rents and home prices, resulting in a greater number of lower-income households facing rising housing costs. Ward3Vision believes greater public action is needed to fulfill the vision of an equitable and inclusive District. In order to meet the demand for a wide range of housing types, it will be critical to increase the overall production of both market rate and affordable housing to take pressure off the limited supply of existing housing and serve a greater range of household incomes.

In addition to the policies outlined in the Housing Element, Ward3Vision supports many of the proposals laid out in OP's "[Single Family Zoning](#)" report, especially the use of the "gentle density" design approach to create "missing middle" development in residential zones. A crucial first step in the process is for the Council to approve OP's amendments to the Comprehensive Plan which designate a targeted increase in the allowable density in Rock Creek West.

Recommendations in Housing Element Applicable to Rock Creek West

The addition of housing in Ward 3 has the potential to provide more affordable housing as well as market rate. To build out to the additional densities proposed will likely require the full menu of the District's land use tools (especially expanded IZ⁵ and both federal and local funding) to achieve the goal of producing 1,990 units of additional affordable housing in Rock Creek West by 2025.

Ward3Vision would like to highlight several policies in the Housing Element as important to implementing these goals:

- Production incentives (Policy H-1.1.2) encourage regulatory and tax incentives that promote housing production, with an emphasis on high-cost areas (H-1.1.8) for both market rate and affordable housing with "innovative tools and techniques".
- Housing Affordability of Public-Owned Sites (H-1.2.1) could be used to great effect in Rock Creek West on publicly owned sites in Tenleytown and Chevy Chase, as well as at UDC or the many other sites owned by DC government in Rock Creek West. We believe publicly owned property

⁵ Ward3Vision also conceptually supports the "[Inclusionary Zoning Plus](#)" proposal from OP that is being advanced as a way to encourage a significantly more development of affordable housing in Rock Creek West.

- such as the Chevy Chase Community Center and Library should be studied for co-development opportunities that would produce significant amounts of affordable housing as well as enhanced community amenity.
- Policy H-1.2.7 encourages zoning incentives through density bonuses for market rate developers to provide a “substantial amount of affordable housing above and beyond any underlying requirement”.
 - Action H-1.2.E which calls for greater Inclusionary Zoning (IZ) requirements when “zoning actions” permit more density. We believe that any upzoning consistent with upFLUMing in the Comp Plan revisions be subject to enhanced Inclusionary Zoning (IZ) requirements to maximize the provision of affordable units and provide for an equitable benefit from public action.
 - Action H-1.2.H, which prioritizes incentives and financing tools in areas lacking affordable housing (less than 15% of housing stock) in accordance with goals to affirmatively further Fair Housing.
 - Action H-1.3.A, which focuses on production and retention of larger units in multi-family housing, and
 - Action H-1.5.D, which supports the study of whether recent changes already made to zoning are enough to support ADU construction. ADUs can produce moderately priced units in single-family and duplex areas of Rock Creek West.

Conclusion

While not perfect, we believe that these amendments to the Comprehensive Plan are a critical step in the right direction for DC as a whole and Ward 3 in particular. OP’s amendments propose the first loosening of exclusionary land use restrictions of significant scale in Rock Creek West since the [introduction of zoning](#) in the District of Columbia.⁶ They advance walkability and sustainability by allowing more transit-oriented development. They chip away at the exclusionary zoning regime that has made Rock Creek West neighborhoods the most expensive in the District, and in turn, [exacerbated income and racial segregation](#) citywide. The comprehensive plan amendments provide an

⁶ As Richard Rothstein documents in *The Color of Law*, segregation was not *de facto* -- the result of chance or income stratification – but rather was *de jure* – brought about by policies, regulations, and laws at the state and federal level which intentionally segregated society by race and provided fewer amenities to communities of color. DC has its own history of zoning, Model Cities, and other programs which wiped out black neighborhoods, such as the original Reno (now part of Tenleytown), and created white enclaves.

excellent foundation for the beginning of changes needed to make the city more affordable and equitable.⁷

For these reasons, we implore the Council to move this legislation forward without delay.

⁷ Other DC ordinances and regulations will need to be built on this foundation to reach the goals of providing more affordable housing and breaking down barriers to enable racial integration. These include, but not limited to: further expansion of the IZ regulations, voucher programs, rent control rules, single-family zoning legislation, and affordable housing financing programs (including the Housing Production Trust Fund and federal low-income housing tax credits).

Appendix: Support of FLUM Proposed Changes

Cleveland Park: Amendment 2123

The Office of Planning has proposed an increase to the density of the Cleveland Park commercial strip on Connecticut Avenue. The current FLUM designation is Low Density Commercial and is zoned NC-3 for low density mixed use. The proposed new FLUM designation is mixed Moderate Density Commercial/High Density Residential. The zone contains five moderate density historic apartment buildings, but single-story commercial is the predominant building type. The zone is immediately surrounded by varying levels of residential density: low, moderate, medium and high, and the surrounding zones include R-1-A , R-1-B, R-2, RA-1, RA-2, RA-4, and R-5-A (PUD). Adjacent to the area are tall residential buildings such as the Broadmoor and Kennedy-Warren (each 9 stories), Woodley Park Towers (7 stories), and Quebec House (13 stories).

The area is a prime candidate for new housing as it sits atop the Cleveland Park Metro station and is served by both north/south and east/west bus lines. It is walkable to shops and services, restaurants, the post office, schools, parks, and the branch library. To both the east and west, the area is buffered by alleys and parking lots, and to the north and south by streets, across which lie higher density zones.

Woodley Park: Amendment 9822 + Wardman Park Marriott Site

The Office of Planning has proposed an increase to the density of the Woodley park commercial strip on Connecticut Avenue and Calvert Street (Amendment 9822). The current FLUM designation is Low Density Commercial and is zoned NC-4 and NC-5 for low density mixed use. The proposed new FLUM designation is mixed Low Density Commercial/High Density Residential. The zone contains just a smattering of residential units, with the predominant building type low density commercial. The area is immediately surrounded by varying levels of residential density including the RF-1, RA-2 and RA-4 zones. Adjacent to the area are taller residential and hotel buildings including the Omni Shoreham, the Wardman Marriott and seven and nine story apartment buildings.

The area is well suited for more mixed-use density as it includes the Woodley Park Metro station and is served by north/south and east/west bus lines and connects bike lanes from the northwest to downtown. It is walkable to shops and services, restaurants, schools, parks and downtown. The area is buffered from adjacent zones by alleys and streets.

While not included in OP's recommendations, we believe adding Low Density Commercial striping to the High Density Residential area that covers the Wardman Park Marriott site on the FLUM would be an improvement. Any future residential development here would be enhanced by the inclusion of neighborhood serving first-floor retail that could allow for a grocery store, for example, which Woodley Park does not have.

Van Ness and Connecticut Ave.

The Future Land Use Map (FLUM) recommendations from OP would allow more housing along the Connecticut Avenue corridor at several locations. The addition of housing in these areas as described below also offer the potential for more affordable housing as well. The additional densities called for may allow for the full menu of the City's land use tools, such as Inclusionary Zoning (IZ) and finance tools such as the Housing Production Trust Fund (HPTF), to be used. The areas recommended for up-FLUMing include the following (see FLUM map for details: <https://plandc.dc.gov/page/future-land-use-map-and-generalized-policy-map>

Van Ness (2352.1, 2352.2, 180 and 1690). This area is also on both sides of Connecticut Avenue from approximately Upton Street north to Albemarle. A significant portion of the land is related to Howard University (east of Connecticut Ave and south of UDC) and UDC (mostly on the west side of Connecticut Ave) and the remainder of Connecticut Avenue up to Albemarle. Land use changes add residential uses at Low, Medium and High densities.

Forest Hills (5013). This area is also on both sides of Connecticut Avenue from 36th Street to Nebraska Avenue. Land use changes from Commercial Low Density to Commercial Medium Density and Residential Medium Density.

Chevy Chase (2238, 2382 and 9821). This area runs on both sides of Connecticut Avenue from Livingston Street to Chevy Chase Circle and includes the Public Library & Community Center. Land use changes include adding residential uses of Moderate densities

Each of these areas could provide both more housing and affordable housing, especially if developments come in at a scale to use the full range of the city's land use and finance tools.

Amendment 26: 5000 & 5100 blocks of Connecticut Ave. (between Fessenden and Nebraska):

Increased FLUM density designation from moderate or low to medium residential and commercial. The height that this change would allow is consistent with existing apartment buildings in the adjoining blocks. This area is on a major commercial and transit corridor, with bus service, a bike share station, and within walking distance to two metro stations. It has the potential to accommodate additional needed housing, including multi-family housing that would offer more housing options. Such development would support existing and added retail and restaurants. This will benefit the neighborhood, making it more vibrant and walkable. Currently, there are three gas stations located there and several empty commercial spaces. We believe that changing the FLUM in this manner will encourage better and more diverse commercial use of this area.

Wisconsin Avenue: Macomb to Upton

The amendments covering Cathedral Commons and McLean Gardens/City Ridge codify what has occurred and provide for infill density. Therefore:

Ward 3 Vision supports FLUM amendment 2803 which increases the density at the Cathedral Commons area from low density commercial to medium density

residential and moderate density commercial. This amendment recognizes the changes that have taken place over the past decade and provides an opportunity for still more infill development at the site over time. Since the Cathedral Commons development has reinvigorated the Cleveland Park-Wisconsin Avenue commercial district and provided some mixed-use residential development, Ward 3 Vision agrees with this change on a well-served bus corridor that will allow further solidification of the area as a retail/commercial hub in its community.

Likewise Ward 3 Vision supports FLUM amendment 9814 which will achieve a similar purpose, building upon the initial City Ridge and McLean Gardens developments and ensuring further opportunities for new residents to live in the area. It changes the land use designation from moderate density residential to medium density residential and moderate density commercial.

Wisconsin Avenue: Upton to Western

Ward3Vision supports the proposed amendments to the FLUM to increase the density along Wisconsin Ave in the blocks immediately to the north and south of the Tenleytown metro stop. For the most part, the area is currently commercial uses (both retail and office with some residential flats above), institutional (AU Law School), public facilities (library, middle and high schools), religious and parkland with a large condominium building constructed above a historic commercial structure (Cityline Condominiums).

We concur with all the FLUM recommendations put forth in the February 2020 [resolution by ANC 3E](#), yet do not make the amendments contingent on production of a small area plan. In addition, we support OP's amendment regarding parcels to the south of Tenley Circle, tracking #'s 2795 and 9823, to be mixed use commercial medium density and residential high density. Although not proposed earlier, we also support up-FLUMming the site of St. Anne's school to be medium density residential.

This concentration of development along the transit corridor is an ideal setting for increased density of both residential and commercial construction because it is already buffered from small-scaled single-family dwelling. In particular, the east side of Wisconsin between Albemarle and Brandywine has been designated as both commercial and residential high density which we concur is appropriate for the above stated reasons.

We appreciate the designation of the entire Wisconsin Ave. corridor from Western Ave. to Massachusetts Ave. as a "Future Planning Analysis Area." We believe a more detailed analysis of potential land use and associated zoning categories would provide greater confidence for significant redevelopment of larger areas.