

WARD 3 VISION

TO: Anita Cozart, Director
Erkin Ozberk, Neighborhood Planner
DC Office of Planning

FROM: Ward 3 Vision Steering Committee

DATE: November 15, 2023

RE: Ward 3 Vision Comments on the Draft Wisconsin Avenue Development Framework

Ward 3 Vision is a grassroots group organized to support walkable, lively streets and public spaces, the creation of more affordable housing and more sustainable transportation options. We generally support the recommendations of the Wisconsin Avenue Development Framework, but with some concerns.

We applaud the recommendations of the Framework for substantial increases in height and density along the Avenue, particularly in the Friendship Heights and Tenley Metro areas. We were very involved in both proposing amendments to the most recent Comprehensive Plan and in supporting the draft when it was sent to the Council, particularly the changes to the Future Land Use Map.

We also are pleased with the attention to improvements to the public realm. These are crucial, especially in light of the proposed height and density increases, to make sure that these increases are complemented by green space, public seating, breaking up super blocks, etc., to foster a strong and compelling lively character for the area as it redevelops. As the OP-sponsored Urban Land Institute Technical Assistance Panel on Friendship Heights observed, the area needs a sense of identity that is warm and inviting. The same is also true for the area around the Tenley Metro Station.

We do have some concerns. In brief:

1. We do agree that past experience with projects being held up by lengthy protests or extinguished by baseless appeals argues for making the proposed density increases matter of right, with conditions such as Inclusionary Zoning +. However, as presently constituted, the recommendations lack tools with which to achieve many of the worthy

goals, such as increased numbers and levels of affordability in new housing, particularly the recommendations for a greater share of family-sized units. The report places a great reliance on upzoning and design standards within the new zoning to achieve design and content goals. We are skeptical that all these can be accomplished through conventional zoning, and see the creation of more flexible tools such as a Tax Increment Financing District or targeted tax abatement as necessary to fill in where it is unrealistic to expect private developers to pay for desired amenities not directly related to their projects.

In fact, to be able to address this issue with more precision, we would recommend that OP ask its excellent consultant, HR&A, to estimate what the typical increase in value will be for land in the upzoned areas. It appears that some of the comments that have been submitted on the Framework may have very unrealistic expectations of the value of that increased density, to expect developers to pay for community amenities without stifling the economics of the new construction we would all like to see. On the other hand, we did not advocate for the upzoning to create windfalls for private land owners, and we support getting substantial public benefits as part of that upzoning.

2. As mentioned above, improvements to the quality of streetscape and the public realm in general are key to achieving the desired community character. However, we don't see these kinds of improvements likely to be accomplished by the application of standard procedures through the Public Space Committee. We would like to see a recommendation for a pilot program with substantially higher standards of design, street furniture and landscaping, in other words, good placemaking in the public realm, possibly through a different implementation mechanism, or at least some type of special pilot regulation overlay guidelines/regulations of the Public Space Committee.
3. As the consultant team included two design firms, we would like to see more specificity in proposals for the public realm, with some basic cost estimates. We don't see how the current somewhat vague recommendations can be achieved without more specific descriptions and budget, perhaps feeding into what kind of revenue would be required from the financial tools mentioned above in #1.
4. We are particularly concerned with respect to the recommendations about the current and proposed WMATA Western Bus Garage sites. Metro's fiscal cliff has been widely discussed. Getting the bus garage site moved off Wisconsin Avenue would be a key strategy for animating that currently moribund stretch of the Avenue. Breaking up that superblock with a pedestrian pathway from the front of the Jenifer Street elevators through to 44th Street could have tremendously positive impact. However, combining

that recommendation with a vague notion of keeping the current garage structure for some type of low-density festival marketplace-type project would severely erode the potential development envelope of the WMATA site, and we fear potentially jeopardize the financing of the new garage on the Lord and Taylor site, given WMATA's financial straits. This, combined with substantial setback and stepback recommendations for the L&T site need to be explicitly examined with respect to the financial feasibility of both projects, especially as we see housing above or next to the bus garage on the L&T site as critical to introducing a strong 24 hour vitality to the area. This could also be the site of a substantial amount of affordable housing, but we can't expect WMATA to subsidize that. This makes a mixed-use residential / bus garage project important, and a strong potential target for the financial tools mentioned in #1 above, or a major contribution from regional entities such as the Amazon Housing Equity Fund.

5. We would like to see additional detail on how the proposed zoning design standards would work, and suggest exploration of a form-based code (FBC) to create a more fine-grained mechanism to accomplish the design goals outlined in the Framework. Perhaps OP could ask for assistance, or at least, a public presentation from the Form-Based Codes Institute to enlighten all relevant parties on what the advantages and requirements of the latest iterations of FBCs are.
6. Sites deserving more specific consideration:
 - a. The "Homeplate" lot. The recommendation for creating a woonerf or joint vehicular/pedestrian configuration on the section of 44th Street between the former Mazza Gallerie and the Homeplate lot is one approach to create more interest and vitality at the street level. We are aware of the fact that the street is technically "closed" but has easements which require it to continue to serve as a roadway. However, the Homeplate lot is a particularly intriguing placemaking opportunity. Perhaps a curb lane of 44th could be combined with the public space on that side of the lot to house some signature piece of public art (playable art, maybe?), or similar place-branding public infrastructure, given the central location of that site within Friendship Heights.
 - b. The Tenley Metro Station plaza, east side – the report is rather vague in its suggestions for the plaza, and its referencing of the DDOT planning for the larger area, but it is essential to recognize the potential importance of that site. There is a ready-made source of pedestrians, given the AU bus stop, the Jackson-Reed school and public pool, the Metro station and the retail on both the east and west sides of Wisconsin Avenue, along with the Tenley Library and Janney

Elementary. That argues for a major investment in placemaking, along with plaza-facing retail to serve the pedestrians and keep “eyes on the street”.

- c. It is well worth noting the extraordinary concentration of educational facilities/resources in the Tenleytown area. In addition to the American University Law School, Jackson-Reed High School, Alice Deal Middle School, Janney Elementary and St. Ann’s School in the immediate vicinity of the Tenleytown Metro Station, there are also a large number of educational facilities just slightly further away, including Georgetown Day School, St. Alban’s Prep, National Cathedral School, Sidwell Friends, Murch Elementary and Beauvoir. This is such an unusual concentration it should be noted in the Framework and consideration given to what facilities (recreational, educational, medical, etc.) might be appropriate to meet this market.
- d. Certainly there is a lot that could improve the NPS land at Tenley Circle. However, the report should possibly recognize that dealing with the National Park Service for the proposed types of improvements can be extremely time-consuming.
- e. The current US Post Office site at 4005 Wisconsin Avenue is a major opportunity site. According to DC Property Quest, it is still owned by the Washington Home, and leased to the Post Office. When that lease expires, it would be good planning to have some expectations articulated about desired future design, at least of the public space. While City Ridge across the street is mentioned, there is no consideration of this site.