

The Committee of 100

on the Federal City



May 19, 2023

Anita Cozart
Director, DC Office of Planning
1100 4th Street, SW, Suite 650 East
Washington, DC 20024

Dear Director Cozart:

The Committee of 100 on the Federal City is submitting this letter as its comment on the Office of Planning’s draft Connecticut Avenue Development Guidelines (the “Guidelines”).

I. Statutory Background.

The Guidelines are intended to fulfill a DC Council directive in the Comprehensive Plan Implementation Element for planning analyses to inform authorized density increases through zoning changes. The Future Planning Analysis Areas shown on the Generalized Policy Map are large tracts or corridors “where future analysis is anticipated to ensure adequate planning for equitable development.” The Council added “**equitable**” during markup and added the following:

The planning process should evaluate current infrastructure and utility capacity against full build out and projected population and employment growth. Planning should also focus on issues most relevant to the community that can be effectively addressed through a planning process. ...

The evaluation of current infrastructure and utility capacity should specify the physical or operational capacity both inside the boundaries and any relevant District-wide infrastructure available.¹

The Council stipulated that these analyses must precede any zoning changes. Based on the Council’s additions during markup, the Council did not want the Zoning Commission to interpret the density changes on the Future Land Use Map without additional information and analysis that provides context for appropriate zoning in these areas.

¹ Implementation Element, 2503.2

II. Infrastructure and Utility Capacity.

The Guidelines fail to address current infrastructure and utility capacity, as the Council has directed. This is a basic flaw that must be corrected prior to submission of the Guidelines for use in any forum.

III. Population and Employment Projections.

The Guidelines also fail to include population and employment projections for the Connecticut Avenue neighborhoods of Cleveland Park and Woodley Park, which are the subject of the draft report. The Guidelines imply that Rock Creek West and these neighborhoods have not carried their weight as the City grows. This is simply not true.

A. Population Projections.

Between 1990 and 2000 Rock Creek West, which is the relevant planning area, continued to grow while most of DC lost population. Rock Creek West gained 3,000 residents between 2000 – 2010, and more than 5,500 residents between 2010 – 2017. The DC Comprehensive Plan reported that the Rock Creek West planning area had 41,000 households based on the 2017 Census and OP projected an increase of 7,000 households for a total of 48,000 households by 2045. In comparison, most other planning areas are not projected to match the households of Rock Creek West by 2045.²

The statement in the Guidelines that Cleveland Park and Woodley Park are not growing as fast as the rest of City is superficial, lacking analysis or context. The real reason is that Rock Creek West and the study areas are nearly built out given their growth over many decades, while many parts of the City that are experiencing growth now were losing population. C100 urges OP to provide complete, accurate data and to eliminate the argument that these neighborhoods are not contributing to the welfare of the City. As presented, there is no foundation for the Zoning Commission to base rezoning on the population growth analysis presented.

B. Employment Projections.

Rock Creek West provides the most jobs in DC outside Central Washington and Near Northwest. Though this information is missing from the Guidelines, the Comprehensive Plan states that Rock Creek West (“RCW”) had 49,000 jobs in 2017. In comparison, the Capitol Hill planning area had 23,500 jobs, Near Northwest had 90,500 jobs, Rock Creek East had 35,000 jobs, and Upper Northeast had 30,700 jobs. Only the planning area that includes much of downtown DC had more jobs than the planning area that includes Cleveland Park and Woodley Park. C100 believes that OP (and the Zoning Commission) should focus on localized employment data.

² It is also relevant that the City lost at least 44,000 residents pre-pandemic between 2015-2019. Further, except for births and international migration, the City as a whole lost population in 2022.

C. Significance of Population and Employment Data.

As the Zoning Commission evaluates how to factor in population growth and employment growth projections to determine the appropriate zones for equitable development, it is important that it have the data on where household growth is stable, where it will grow and how much, where jobs are now and where jobs will likely increase. OP has provided none of this data and thus, no analysis. **It seems clear however that the neighborhoods focused on in the Connecticut Avenue Development Guidelines are not lagging, as OP contends, but have been solid contributors to the City in both household and job growth. There is no reason to conclude that this pattern of reliable growth will not continue.**

IV. Income and Affordable Housing.

While the Council did not ask OP to analyze resident income levels as part of its planning analysis, OP included it, and C100 sees this information as helpful for achieving equitable affordable housing goals. Using the DC income data, OP makes the comparison that the citywide median household income is \$90,842 whereas the median household in the study area is \$126,957. Since residents in the study area, and indeed in the Rock Creek West planning area, are predominately White, it would be more instructive to breakdown the DC median household income data between Black and White households. That would show that the citywide DC Black median household income is \$45,072 while the DC White median household income is \$141,650. Unquestionably, there is a huge disparity between Black household and White household incomes both inside and outside the study area. However, OP misses the opportunity to use this data to conclude that DC needs more affordable housing in the study areas as well as citywide. That is the essential point OP should be making when addressing income disparities.

The Council at markup included a provision that allows up-zonings to proceed without a planning analysis if at least 25% of any housing units proposed are set aside for households at 30% and 50% MFI.³ The Council explained that it's in the District's interest to produce deeply affordable housing. C100 urges OP to revise the Guidelines to incorporate these affordable housing requirements so that they can be applied in relevant rezoning proceedings. As OP is aware, the Zoning Commission's Inclusionary Zoning requirements do not include deeply affordable housing or the set-aside level the Council approved for areas in the Future Analysis Planning Areas to avoid any planning delays before proceeding to the Zoning Commission for zoning changes. The Zoning Commission must consider more aggressive affordable housing requirements as it rezones many of the areas included in the Future Planning Analysis Areas. Yet, the OP Guidelines do not recommend more deeply affordable housing or greater set-asides than the current IZ and IZ+ programs require. C100 finds that this ignores the Council's conclusion that equitable development in these areas should include more deeply affordable housing, which would reach more DC Black households.

³ Implementation Element, 2503.3

V. Zoning.

The above references to the Comprehensive Plan Implementation Element and the Council's markup proceedings indicate that the Zoning Commission should be very deliberative in upzoning the Future Planning Analysis Areas. The OP Guidelines do not provide the Zoning Commission with the tools to perform this task.

Cleveland Park and Woodley Park not only are very different communities with unique contexts but are also different from the other Future Analysis Planning Areas. The other future planning areas include the Armed Forces Retirement Home area, Poplar Point, RFK Stadium area, St. Elizabeth and the adjoining Congress Heights area, New York Avenue, Wisconsin Avenue corridor, and Foggy Bottom West End. Many of these areas are Land Use Change Areas on the Generalized Policy Map, which means the Council wants to introduce new uses such as residential to areas that may have been under federal ownership or reserved only for industrial uses.

The Wisconsin Avenue corridor and the Connecticut Avenue corridor are very different from these other areas because they are almost fully built out with strong residential areas. The changes to the Future Land Use Map (FLUM) for these areas that were approved by the Council focus on increasing residential density. In Cleveland Park the current use is low density commercial (which allows some residential), but with the FLUM change the use becomes moderate density commercial and medium density residential. In Woodley Park, high density residential is the current use to the west of Connecticut Avenue and with the FLUM change that use extends east to cover a two-block area of Connecticut Avenue. There are no density changes for any other part of Connecticut Avenue abutting these neighborhoods or within the neighborhoods.

The OP Guidelines do not effectively separate Cleveland Park and Woodley Park. It is difficult to discern when OP is discussing one area versus the other. When there is a separate discussion, the information is often vague and unhelpful as guidance to the Zoning Commission in fulfilling its task to carefully consider how to interpret density changes into zone changes. Illustrations of 14th Street and Alexandria, Virginia do not seem relevant to the communities being analyzed.

There is no analysis of lot depths, widths, alley widths, current uses, current building heights or other contextual information that is essential to create development guidelines. There is no information about the feasibility of constructing proposed seven or more stories above very old one- or two-story buildings, many of which are above the Metro tunnel. There is no discussion of demolition and whether it would be allowable. There is no mention of the unchanging abutting zones and how those uses might be affected by the range of zones applicable for the authorized new density levels, or of gentle density, a term OP has used to protect abutting residential areas. In short, it is hard to find analysis in the Guidelines to support OP's conclusion that 75 feet of height and 5.0 FAR are appropriate for Cleveland Park and the same height with a 5.5 FAR is appropriate in Woodley Park on the east side of Connecticut Avenue while 90 feet and 6.0 FAR are appropriate on the western side.

Cleveland Park and Woodley Park are zoned Neighborhood Commercial (“NC”) zones. Recently, OP told ANC 3/4G that it intends to recommend that the Connecticut Avenue corridor in Chevy Chase be zoned a Neighborhood Commercial corridor. It is reasonable to expect that OP will recommend to the Zoning Commission that density changes in Cleveland Park and Woodley Park be incorporated into the current NC zone. However, none of the current NC zones in the City designated as medium density permit the height and FAR that OP is suggesting for Cleveland Park except for a one block area (three parcels) on H Street, NE that is adjacent to a mixed-use zone. Notably, many of the medium density NC zones are adjacent to residential flat, residential apartment, or industrial zones. None are adjacent to residential zones as the west side of Connecticut Avenue in Cleveland Park is.

The task for OP in guiding the Zoning Commission to the appropriate height and FAR, and other dimensional criteria, was not to recommend the most height and FAR it could rationalize but to analyze what would be the most appropriate height and FAR given the context. OP has not explained why, given the context of each neighborhood in the analysis area, it chose those heights and FAR. Based on our analysis, C100 finds that the study areas do not need a lot of new market rate housing, but they do need more affordable housing accessible to a greater number of Black households, which means more deeply affordable housing. C100 urges OP to reconsider the extreme heights and FAR it is suggesting and to develop analysis around its choices and incorporate a contextual framework as well as a recommendation for a higher percentage of affordable housing, including deeply affordable housing.

VI. Historic Preservation.

The C100 is aware that OP has presented updates to the DC Historic Preservation Review Board (HPRB) on its preparation of the guidelines for Cleveland Park and Woodley Park, both historic districts. While there are landmarks located in a few other Future Analysis Planning Areas, C100 does not believe that any of the other Planning Areas encompass historic districts. It is significant that the Council did not mention the HPRB in connection with the production of the development Guidelines, which are clearly intended to inform zoning changes by the Zoning Commission.

The C100 strongly opposes any action by the HPRB regarding these development Guidelines that would pertain to the Cleveland Park Historic District or the Woodley Park Historic District. **HPRB review of applications for new construction or additions in historic districts must be based on the DC Historic Preservation Law. It would be inappropriate for the HPRB to accept or approve development guidelines which could compromise its independent review based on its standards.**

Further, C100 strongly urges OP to refrain from asking the HPRB to take any action on its development Guidelines and to remove any language in the Guidelines that suggest that design guidance for HPRB is included in the report. While OP can provide design guidance to the Zoning Commission for Planned Unit Developments, OP should not attempt to influence the standards that HPRB uses in its reviews. It would be extremely unwise and unprecedented for

HPRB to use development guidance prepared by OP as appropriate standards when reviewing applications in the future for Cleveland Park or Woodley Park. Zoning reviews and HPRB reviews are separate and distinct, and they should remain so.

The C100 appreciates the opportunity to comment on the draft Connecticut Avenue Development Guidelines. We look forward to commenting as this draft moves towards finalization, as well as on other guidelines in furtherance of the Future Planning Analysis Areas.

Best regards,

Shelly Repp
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Cc: Marnique Heath, Chair, DC Historic Preservation Review Board.