



Comprehensive Plan Task Force Report and Recommendations January 23, 2020

ANC
3/4G

A report of the ANC 3/4G Task Force convened to study proposed changes to the DC Comprehensive Plan. Through research, analysis, public meetings, outreach, and a robust community survey, the Task Force developed both a vision for Chevy Chase DC and recommendations for the proposed Plan and accompanying Maps, including:

1. Designate Connecticut Avenue as the Chevy Chase Gateway;
2. Create a Small Area Plan for the Chevy Chase Gateway;
3. Protect, maintain, and improve the livability and vibrancy of the neighborhood;
4. Encourage creative affordable housing solutions in Chevy Chase DC;
5. Specify plans for school facilities that can support the projected population growth.

The Task Force requests that the ANC adopt this Report and recommendations.

Advisory Neighborhood Commission 3/4G
Comprehensive Plan Task Force
Report and Recommendations
January 23, 2020

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I. Executive Summary

The Advisory Neighborhood Commission (ANC) 3/4G convened a Task Force to conduct a thorough analysis of proposed amendments to the Comprehensive Plan. This report presents the results of the Task Force’s work, which included research, analysis, public meetings, outreach, and a robust community survey. Various members of the D.C. Office of Planning (OP) provided valuable and prompt assistance to the Task Force in its preparation of the Report. The Report also provides background on the proposed amendments, the Task Force’s analysis of those amendments, and its recommendations. The Task Force urges the ANC to adopt this report and the Task Force’s recommendations for submission to the OP.

The Task Force embraces the Comprehensive Plan’s dual principles that “the residential character of neighborhoods must be protected, maintained, and improved” while also contributing to the District’s identity as “an integral part of a diverse larger community” by sharing “in the overall social responsibilities of the community, including accommodating the overall growth in new residents, housing the homeless, feeding the hungry, and accommodating the disabled.”¹ While the OP’s proposed amendments to the Comprehensive Plan broadly acknowledge these principles, they do not provide the required degree of specificity and granularity to address the specific needs of ANC 3/4G residents. Moreover, the Plan should clearly demonstrate a coordinated development with articulated standards and should include an in-depth, consistent implementation plan with measures for evaluating progress.

The Task Force recommends that the ANC, on behalf of its constituents, request that the OP modify its proposal in four crucial ways:

First, the Comprehensive Plan should not open the door to any action by the Zoning Commission for proposed changes along the Chevy Chase Gateway to the District without first completing a thorough, detailed “Small Area Plan”² that reflects broad input from planning professionals, established businesses, historical preservationists, affordable

¹ See the Council-approved Comprehensive Plan Framework Element, Sections 220.3 and 220.7, pages 48-49, at <http://bit.ly/2pb6L-WB>.

² OP describes the process for developing and approving Small Area Plans at <http://bit.ly/2NMMLSV>.

housing experts, property owners, and residents.³ The Comprehensive Plan should not leave development of this unique resource solely to the vagaries of the market but should provide sufficient guidance and particularity to ensure that the resulting development accommodate growth while harmonizing with the residential character of the neighborhood and succeed in meeting the needs of a growing, mixed-income population.

Second, the Small Area Plan must provide for, encourage, and facilitate creative affordable housing solutions along the Chevy Chase Gateway. See Section IV, D below. The ambitious goals for new affordable housing units in our area will not be achieved solely through traditional programs that designate a token proportion of market-rate buildings as affordable — i.e., “inclusionary zoning.” The Small Area Plan should recognize this neighborhood’s opportunities and limitations by stimulating partnerships and coalitions of developers — non-profit and for-profit — and by acknowledging the need for significant District participation through contributions of its own resources (e.g., through the Housing Production Trust Fund or making public property available for affordable housing). The value created by allowing greater density belongs to the residents of the District, and they should use that asset to the fullest in furthering affordable housing objectives.

Third, the Comprehensive Plan should designate upper Connecticut Avenue from Chevy Chase Circle to Livingston Street NW as the “Chevy Chase Gateway.” See Section IV, A below. Like other designated gateways, the Connecticut Avenue corridor is an entrance to the city along a major artery, and thus should be recognized as such. When planned and designed as a coherent Chevy Chase Gateway, the Connecticut Avenue corridor can become an iconic introduction to the District and reflect the value our city places on unique, vibrant, and diverse neighborhoods.

Fourth, the Comprehensive Plan acknowledges generally the essential need and well-documented requirement for new infrastructure improvement and expansion to serve a growing population. See Section IV, E below. All forms of existing infrastructure — e.g., transportation, utilities, recreation facilities, libraries, and public safety — will be inadequate to meet the projected growth rates. Most notably the Plan must include specifics for where, when, and how the District will locate, build, and fund public schools for the children in our community so that new development will not exacerbate current school overcrowding. Rock Creek West is already confronting a crisis in school over-

³ Task Force members Andrea Rosen and Jonathan Guy concur that a Small Area Plan should be promptly prepared to guide new development in the Chevy Chase Gateway, and urge the Office of Planning (OP) to amend the Future Land Use Map *following* that Small Area Plan. This will give the OP and the community the maximum opportunity and flexibility to realize the most affordable housing benefits from new development against the benchmark of the current land use designation in the Future Land Use Map (low density commercial) and current zoning (low density mixed use, MU-3A), and at commensurate land prices, i.e., not at the increased values that will follow from increased land use density on the FLUM. It will also ensure that land use density amendments will correspond with the small area plan to be agreed between OP, residents, and commercial property owners. This was the consensus formulation that was posted to the ANC website on January 21, 2020: “The Comprehensive Plan should not amend the Future Land Use Map (FLUM) and thereby open the door to increased density along the Chevy Chase Gateway to the District without *first* completing a thorough, detailed ‘Small Area Plan.’”

crowding, but the proposed Plan amendments do not specifically address where schools can be located or how they will be funded. It would be imprudent to proceed with the Plan's growth scenarios while neglecting to address the hard questions about public schools.

II. Background

The Comprehensive Plan is a 20-year framework that guides the District's future growth and development. Originally adopted in 2006 and amended in 2011, it addresses a wide range of topics, including land use; economic development; housing; environmental protection; historic preservation; arts and culture; infrastructure; parks, recreation, and open spaces; education facilities; and transportation networks and modes. The District is in the midst of considering significant amendments to the Plan prepared by OP. After receiving public comments and ANC resolutions, OP will finalize these amendments and send them to the Council for its consideration. The Council may hold hearings and make changes to OP's proposed amendments. If approved by the Council and signed by the Mayor, the amendments to the Plan become law.

The Comprehensive Plan consists of four major components.

1. The Framework Element provides the context for the rest of the Plan by describing changes in demographics, economics, technology, and finances. It describes the District's growth forecasts and projections and shows how and where the District expects to add households, people, and jobs through 2045. The Framework Element "tells the story" of how the District is expected to change during the next two decades. As noted below, the Council has already approved the revised Framework Element, and it is legally binding.
2. The Citywide Elements describe the vision for the District's future in terms of land use, economic development, housing, arts and culture, environmental protection, transportation, community services and facilities, educational facilities, urban design, historic preservation, infrastructure (e.g., utilities), and parks, recreation, and open space.
3. The Future Land Use Map (FLUM)⁴ and the Generalized Policy Map (GPM)⁵ are to be used as "a generalized guide for development and conservation decisions." Thus, an increase in density of the land use designation for a particular area on the FLUM does not automatically change the zoning

⁴ See the proposed Future Land Use Map at <http://bit.ly/2JBLyfk>.

⁵ See the proposed Generalized Policy Map at <http://bit.ly/34T2eY1>.

for that area. Critically, however, such an increase could facilitate a later request for increased zoning density as being “not inconsistent” with the new FLUM.

4. The Area Elements focus on planning for particular parts of the city. ANC 3/4G⁶ is in the area designated Rock Creek West, which includes most of Ward 3 and the portion of Ward 4 west of Rock Creek Park.

In October 2019, after extensive comments on the Framework Element by ANCs, residents, and organizations, the Council passed that component of the Plan. Shortly after, OP released the remainder of the elements for comment. ANC 3/4G created this Comprehensive Plan Task Force to study OP’s draft, to gather information from the community, and to make recommendations to the Commission.⁷ Appendix A contains a more detailed description of the Task Force’s activities.

III. Community Survey

The Task Force recognized at its first meeting on November 12, 2019, that public meetings would not provide adequate data on the views of a broad range of ANC 3/4G residents. It determined then to conduct a community-wide survey to gather detailed information on Comprehensive Plan topics. As such, the Task Force developed an eight-question online survey using the QuestionPro platform.

The first three questions asked for demographic data — age, voting precinct as a surrogate for location, and length of time residing at current location — that could be used to ensure that the survey respondents were reasonably representative of the community and to determine whether different demographics have different views. The remaining questions asked about the factors that make for a successful neighborhood (using the same categories that OP used in its Values Campaign Survey), factors that the Comprehensive Plan should address for the Chevy Chase DC area, preferred modes of transportation, preferences for the type of housing that should be added to the Chevy Chase DC area, and types of development in Chevy Chase DC that are appropriate over the next few years.

Appendix B discusses the survey methodology, while Appendix C provides detailed results. The survey — with 682 completed responses — provided robust data to inform and support the Task Force’s analysis and recommendations.

⁶ See ANC boundaries at <https://anc3g.org/about/anc-34g-map/>.

⁷ The members of the Task Force were: (1) Commissioners Randy Speck (chair of the Task Force), Dan Bradfield, Jerry Malitz, and Chris Fromboluti; (2) residents Jonathan Guy, Linda Komes, Ron Eichner, Andrea Rosen, and Allen Seeber; (3) business representatives David Kim (Circle Wine & Spirits) and Tim Walsh (Capital Crab & Seafood and The Avenue). Marelise Voss made contributions to this Report.

IV. Analysis and Recommendations

The Task Force had neither the time nor resources to undertake a thorough review of the entire Plan, and therefore decided to concentrate on those proposed elements that might directly and significantly affect the ANC 3/4G neighborhood. It also became clear to the Task Force that its efforts to conduct a full and comprehensive analysis would be hampered by the absence of firm, standardized terms and definitions — e.g., a glossary — that are used in OP’s proposed amendments. The draft contains too much ambiguity and uses terms inconsistently, which creates uncertainty and confusion. We urge OP to address this deficiency.

The Task Force identified four areas that are especially important for this community: (1) the proposed changes to the FLUM for the Connecticut Avenue corridor; (2) the priority given to creation of affordable and moderate-income⁸ housing; (3) the need for “livable” neighborhoods that serve the community; and (4) the infrastructure — particularly schools — that is necessary to support projected growth. These themes are woven throughout the analysis and recommendations that follow.

The Task Force considered three primary questions:

1. What is the community’s vision for the public gateway to DC via the Connecticut Avenue corridor? How should this corridor, from Chevy Chase Circle to Livingston Street, evolve over the next 20 years to adapt to healthy growth while maintaining the architectural character and sense of place that make our neighborhood distinctive? (See recommendations A, B, and C below.)
2. How can our neighborhood significantly increase the amount of affordable and moderate-income housing so that Chevy Chase DC is accessible to residents of diverse incomes? (See recommendation D below.)
3. How can we plan for realistic growth so that there will be adequate infrastructure to support the existing and expanding population, particularly by increasing public school capacity for our children? (See recommendation E below.)

⁸ The body of this report uses “moderate-income” housing to reflect the Mayor’s Housing Equity Report; later references to the ANC 3/4G Community Survey retain the term “workforce” housing to reflect terminology that was used in the survey.

A. Designate the Chevy Chase Gateway

The Task Force recommends that the Comprehensive Plan designate upper Connecticut Avenue from Chevy Chase Circle to Livingston Street NW as the Chevy Chase Gateway, bringing it into alignment with other city gateways.

“Gateway corridors,” according to the proposed Plan, “are entrances to the city, and part of the national identity of the District.”⁹ “Special attention should be placed on how public space, building restriction areas, and buildings along them contribute to each thoroughfare’s character.”¹⁰ OP urges creation of:

more distinctive and memorable gateways at points of entry to the District and in neighborhoods, parks and open spaces, and neighborhood centers. Gateways should provide a sense of transition, orientation and arrival through improvements in the form of landscaping, artwork, commemoration, and roadway design, and should be designed to make a strong and positive visual impact.¹¹

The Task Force supports this design approach. Connecticut Avenue south of Chevy Chase Circle is a major vehicular entrance into the District from Maryland. A 2015 Maryland State Highway Administration count found that 42,552 vehicles cross the Maryland-District line on Connecticut Avenue daily.¹² The proposed Comprehensive Plan amendments recognize the importance of the District’s “gateways” but inexplicably neglect to identify this entrance to the City on Connecticut Avenue as a “gateway.”

The Plan should elevate this important introduction to the District to gateway status. As cars slow down to navigate the Circle, they should be greeted with a transition space from the purely residential and country club environment in Maryland to the beginnings of the City and a somewhat more urban setting. The shops and public spaces should invite people to stop in a suitable parking environment, not to simply rush through a canyon of buildings. This is an opportunity for the District to display its best character as a city of cohesive, vibrant, strong neighborhoods that respect the past, look to the future, and embrace small business entrepreneurs.

⁹ See the proposed Urban Design Element, page 27, at <https://bit.ly/2tE2w8b>.

¹⁰ See page 28.

¹¹ See page 28.

¹² See the 2015 Traffic Volume by County Maps at <http://bit.ly/2RzSRZN> and “What’s the Most Heavily Travelled Local Road,” Bethesda Magazine, July 27, 2016, at <http://bit.ly/2RAaCbj>.

B. Create a Small Area Plan for the Chevy Chase Gateway

The Task Force recommends the use of two mechanisms provided by the Comprehensive Plan to focus greater planning attention on the Chevy Chase Gateway before any change is permitted.

The first mechanism is a **Future Planning Analysis Area**. The General Policy Map should delineate Chevy Chase Gateway as a Future Planning Analysis Area where:

anticipated future planning efforts will be undertaken in the near term (1-5 years) to analyze land use and policy impacts, mitigate and incorporate anticipated growth, and help inform any significant zoning changes. The process should evaluate current infrastructure and utility capacity against the full build out and projected population growth, and include issues most relevant to the community that can be effectively addressed through a neighborhood planning process.¹³

The proposed Plan amendments overlook an opportunity to develop a cohesive vision for this five-block stretch of Connecticut Avenue that could guide future sound development. While the proposed Rock Creek West Area Element addresses Cleveland Park and Van Ness as significant planning areas and designates large portions of Wisconsin Avenue as an area for Future Planning Analysis,¹⁴ it does not but should designate Chevy Chase Gateway as a Future Planning Analysis Area.

The second mechanism is a **Small Area Plan**. As stated in the Generalized Policy Map, Future Planning Analysis “generally establish[es] guiding documents such as Small Area Plans.”¹⁵ The Task Force urges OP to designate — and fund — the Chevy Chase Gateway for a Small Area Planning effort.¹⁶ Section 2503 of the Implementation Element (<http://bit.ly/2Pt5BhZ> at pages 5-6) defines “small area plans” and how they are to be used.

Small Area Plans cover defined geographic areas that require more focused direction than can be provided by the Comprehensive Plan. The intent of such plans is to guide long-range development, and improve neighborhoods, achieve citywide goals, and attain economic and community benefits. The Comprehensive Plan Area Elements identify recommended loca-

¹³ See the proposed Generalized Policy Map legend at <http://bit.ly/34T2eYl>.

¹⁴ See the proposed Rock Creek West Area Element, Section 2310.1, page 26, at <https://bit.ly/2RPTNrt>.

¹⁵ See the proposed Generalized Policy Map legend at <http://bit.ly/34T2eYl>.

¹⁶ One recent example of a Small Area Plan is the Southwest Neighborhood Plan, available at <http://bit.ly/2tCRgZq>.

tions for Small Area Plans, with an emphasis on the Land Use Change Areas, Enhancement Areas, and business districts shown on the Comprehensive Plan's Generalized Policies Map. A Small Area Plan provides supplemental guidance to the Comprehensive Plan, unless incorporated into the Comprehensive Plan by Council act. In exceptional cases, it may be appropriate to prepare a Small Area Plan for an area not called for in the Comprehensive Plan. ANC and public involvement in the development of Small Area Plans is desired and expected.¹⁷

The policy for Small Area Plans is to:

prepare Small Area Plans and other planning studies for parts of the city where detailed direction or standards are needed to guide land use, transportation, urban design, and other future physical planning decisions. The focus should be on areas that offer opportunities for new residential, commercial, and mixed-use development, or areas with problems or characteristics requiring place-specific planning actions. Use the Comprehensive Plan Area Elements, the Generalized Policies Map, and land use monitoring activities to identify areas in the city where such plans are needed. The Mayor may also initiate a Small Area Plan in response to community requests that demonstrate a clear purpose and need at the urging of citizens.¹⁸

The Rock Creek West Area Element should designate the Chevy Chase Gateway for a Small Area Plan that carefully and thoughtfully will guide and accommodate new development. Section 2311 (page 30) should state the Small Area Plan's policy to prepare a thorough, cohesive plan for the Chevy Case Gateway that includes mixed-use low density commercial and moderate-density residential at a scale and density commensurate with the surrounding neighborhood and the gateway entrance to the District from Maryland. New housing should focus on mixed-income residents with a strong emphasis on creating affordable and moderate-income housing and providing for home ownership that can build wealth. (See further discussion of housing solutions below.) Retail planning should focus on retaining and creating greater opportunities for small businesses that are the lifeblood of the community. The ANC, residents, small business owners, architects, engineers, planners, and experienced developers — both for-profit and non-profit developers, e.g., So Others Might Eat (SOME) or Habitat for Humanity — should be involved in preparing the Small Area Plan.

The essential characteristics of the Small Area Chevy Chase Gateway Plan are listed below in Figure 1.

¹⁷ See the proposed Implementation Element, Section 2503, pages 5-6, at <http://bit.ly/2Pt5BhZ>.

¹⁸ See the proposed Implementation Element, Section 2503, pages 5-6, at <http://bit.ly/2Pt5BhZ>.

Figure 1. Characteristics of the Chevy Chase Gateway Small Area Plan

The Task Force generally agrees that the following characteristics should be included in the Small Area Plan for the Chevy Chase Gateway:

- New buildings that are aesthetically and physically compatible with existing buildings on Connecticut Avenue;
- New construction that respects the existing historic landmark structures on the west side of Connecticut Avenue (e.g., the Chevy Chase Arcade, the Avalon Theater, and the WMATA bus depot) as well as the richness and diversity of the existing bungalows, kit houses, and other single-family houses and traditional apartment buildings in the area;
- New ground-floor retail that includes varied pedestrian-scale facades to preserve the quality of individual, traditional “Main Street” storefronts, regardless of the building size;
- Attractive streetscapes incorporating special paving, lighting, street trees, benches, and seasonal plantings;
- Incentives that encourage the retention of neighborhood-serving retail with particular emphasis on locally-owned-and-operated small (“mom-and-pop”) businesses;
- Parking (including potentially underground) to support commercial businesses and new residential development;
- Enhancement of the Chevy Chase Library and the Community Center campus to create an active public space with such features as a community garden, mini-urban farm, rain gardens, community compost drop-off point, docking stations for scooters and rental bikes, etc.;
- Modernization of the Chevy Chase Library to include mixed-use/co-location with affordable housing development;
- Green buildings with geothermal, solar, green roofs, rainwater capture, repurposed materials, etc.;
- Modernization of the Bus Turnaround site to serve as station for a new shuttle connector to Metro, a location for local history and arts displays, retail pop-ups, potentially being incorporated into housing, etc.;
- Placemaking features such as public art and interpretive signage that emphasize the history of the community, including its diverse roots (e.g., the African American community at what is now Lafayette Park and proposed to be renamed Lafayette-Pointer Park); and
- New affordable and moderate-income housing offered on a first-priority basis to teachers, librarians, first responders, caregivers, etc., who work locally and whose salaries are publicly funded, to reduce their travel time and costs, enhance their quality of life, and allow them to become part of the fabric of the community in which they work.

Importantly, because the increases in land use density proposed for the **Future Land Use Map** could significantly affect the structures, environment, and activity along Chevy Chase Gateway, the Zoning Commission should not consider zoning changes based on the FLUM until the Small Area Plan is completed. The proposed amendments to the FLUM would change the intended future use for the northernmost portion of the Connecticut Avenue corridor from its current designation as low-density commercial¹⁹ to mixed-use low-density commercial and moderate-density residential.²⁰ The Chevy Chase Community Center and Library would change from their current designation as local public facilities to mixed-use local public facilities, low-density commercial, and moderate-density residential.²¹ The proposed changes seek to address both the need, since the 2006 Comprehensive Plan, for more housing to accommodate projected growth and the approach to locate housing and shopping near transit as one way to combat climate change.²² The Task Force notes, however, that changes have not been consistently applied along the Connecticut Avenue corridor (e.g., for the block south of Nebraska Avenue, OP proposes leaving the land use designation as low-density commercial).

The Task Force is concerned that Chevy Chase Gateway will end up a hodge-podge of one-off developments incompatible with the neighborhood and its needs.²³ The proposed FLUM changes do not provide the necessary specificity or protections to ensure that future development will achieve the community's affordable housing, livability, infrastructure, and environmental goals.²⁴ While Zoning Commission procedures permit ANC and limited community participation in zoning and PUD proceedings, the proposed amendments provide no site-specific guidelines for how development will meet community goals. Therefore, the Task Force recommends addressing that level of uncertainty by

¹⁹ See the existing FLUM at <http://bit.ly/32SZw3m>.

²⁰ Any effort to develop the property at 5521 Connecticut Avenue, occupied by a full-service Exxon service station, would not be permitted under DC Code Section 36-301(b) (available at <http://bit.ly/35dSxnl>): “No retail service station which is operated as a full service retail service station on or after April 19, 1977, may be structurally altered, modified, or otherwise converted, irrespective of the type or magnitude of the alteration, modification, or conversion....” A prerequisite for granting an exception is that “the operator... is experiencing extreme financial hardship,” which it does not appear can be met in this instance.

²¹ See the proposed FLUM at <http://bit.ly/2JBLyfk>.

²² Appendix D describes the Task Force's communications with OP in an effort to better understand the practical impact of the proposed changes.

²³ The Task Force is concerned that the FLUM changes will create a windfall for affected property owners with little public benefit in return. The proposed Tenleytown development (see discussion at footnote 50) is a case in point. It seeks an increase in zoning above MU-4 in return for only three affordable units out of 41. We urge OP to set explicit development standards for rezoning that will allow District residents to achieve a fair and greater share in the value created by increased density by requiring larger set-asides for affordable housing and other tangible benefits than currently provided for under D.C. laws.

²⁴ This lack of granularity is particularly important because the adopted Framework Element no longer requires that a new development be “compatible with the character and scale of the Future Land Use Map land use category” (Framework Element, Section 227.2). In addition, the proposed Rock Creek West Area Element would delete language that would require that “any development along the [Connecticut Avenue] corridor be consistent with the designation of these areas in the Future Land Use Map, zoning overlay requirements, and the scale of the adjoining uses.”

a mandatory, site-specific planning process — a Small Area Plan with design guidelines that the Zoning Commission is required to take into account — encompassing the entire Chevy Chase Gateway. A more granular study and community discussion are necessary to address issues of compatibility with, and impact on, the surrounding area and creation of the urban character and vitality we all envision.

The Task Force recommends that OP reinstate language in the Comprehensive Plan on planning and development priorities and certain key policies. Establishing sound priorities and policies facilitates good planning and advances development of the “livable” neighborhoods that are a City priority.

The proposed Land Use Element acknowledges the importance of maintaining and enhancing livable neighborhoods:

Strong neighborhoods are key for continued livability in a growing and changing city. Land use policies must ensure that all neighborhoods have adequate access to commercial services, parks, educational and cultural facilities, share in economic mobility, and sufficient and accessible housing opportunities while respecting their rich historic and cultural legacies.²⁵

* * *

A successful neighborhood should create a sense of belonging, civic pride, and a collective sense of stewardship and responsibility for the community’s future among all residents. Indeed, a neighborhood’s success must be measured by more than the income of its residents or the size of its homes.²⁶

* * *

Neighborhood success must not only include achieving the desired physical characteristics but also ensuring that every community plays a part in supporting investment and development that advances neighborhood vitality, growth, and economic mobility, and increases access, equity, and where appropriate, jobs.²⁷

The proposed Land Use Element appears, however, to deemphasize “stability” and to place greater emphasis on accommodating growth. For instance, the “land use goal” deletes “stability” as a goal and adds “to provide for additional housing and employment opportunities” that will “support a growing population.”²⁸ The new section on “Supporting Growth” states that “the continued interest in living and working in the District re-

²⁵ See the proposed Land Use Element, page 33, at <https://bit.ly/37rG13p>.

²⁶ Page 34.

²⁷ Page 35.

²⁸ Page 9.

quires a shift in planning efforts to support such growth and the challenges it brings.” Rather than “protecting” existing neighborhoods, OP proposes “respecting” those neighborhoods,²⁹ presumably intending to permit greater accommodation of growth. OP re-frames a “critical urban design issue” as “strengthening neighborhoods [sic] quality of life while accommodating growth and change.”³⁰ The proposed amendments delete the principle that “the design of commercial and mixed-use development also should be harmonious with its surroundings” and instead urges “solutions on how to grow while maintaining neighborhood character.”³¹

The proposed amendments do recognize, however, that growth around transit hubs “must be balanced with other land use policies which include conserving neighborhoods.”³² The Plan recognizes that “many priority transit corridors transition to single family homes or row houses just one-half block or less off the street itself, warranting due attention when development is planned.” Transit corridor plans and studies should include “neighborhood conservation and enhancement.”³³

Nevertheless, the proposed Rock Creek West Area Element deletes the section that describes “Planning and Development Priorities,” including such issues as parking, schools, trees, and recreation facilities.³⁴ The priorities that Rock Creek West residents identified in 2006 — such as new development that is compatible with existing buildings, increasing affordable housing, reducing traffic congestion, improving pedestrian safety, expanding commercial and residential parking, and addressing overcrowding at public schools — have not changed, and, if anything, have become more acute. While these priorities may be discussed elsewhere in the Comprehensive Plan, they continue to be important planning considerations for this community. Failure to consider them in the Rock Creek West Area Element, while simultaneously proposing increased density along Chevy Chase Gateway, is problematic. If OP is to increase land use density on the FLUM, which will facilitate increased zoning density, there should first be a plan in place to explain what the impact of that increase will be on infrastructure and how that impact will be addressed.

Other deletions in the proposed Rock Creek West Element suggest an unwarranted deemphasis on livability considerations. For instance, in addressing “Neighborhood Con-

²⁹ See, for example, page 48.

³⁰ See the proposed Urban Design Element, page 1, at <https://bit.ly/30PSA7H>.

³¹ See the proposed Land Use Element, pages 40, 42.

³² Page 27.

³³ Page 30.

³⁴ See the proposed Rock Creek West Area Element, pages 13-17, at <https://bit.ly/3aKrzqS>.

servation,” OP proposes to delete “infrastructure constraints” as a factor that must be “carefully managed” when considering future residential and commercial development.³⁵ Infrastructure constraints remain a significant concern.

The proposed amendments make a number of further deletions of important livability considerations. For instance,

- The proposed policy for Managing Traffic Demand no longer “ensures” that new development “does not unreasonably degrade traffic conditions” but merely “encourages” new development “to provide multimodal transportation options and traffic calming.”
- Rather than a policy for “Congestion Management Measures,” OP proposes a policy to “Reduce Single Occupancy Vehicle Trips” and deletes provisions that “land use decisions do not exacerbate congestion and parking problems” and that “traffic studies and mitigation plans should consider not only the impacts of the project under consideration but the cumulative impact of other projects which also may impact the community, as well as the impact of non- resident drivers using local streets.”
- The proposed “Parking” policy deletes “use of easements with private developers to provide additional public parking options in the area’s commercial districts” and that “on street public parking should not be removed within these districts.”³⁶

Reinstating these priorities and policies will ensure sound future development for the Chevy Chase Gateway.³⁷

C. Encourage Creative Affordable Housing Solutions

The Task Force anticipates that the Comprehensive Plan, by designating a Small Area Plan, will promote creative affordable housing solutions along the Chevy Chase Gateway. The Task Force supports the goal of providing more new, dedicated affordable and moderate-income housing in ANC 3/4G and agrees that the ultimate objective of affordable housing should be to enable low-income residents to build wealth. The ambi-

³⁵ Page 17.

³⁶ Page 20.

³⁷ The Sections of the Rock Creek West Area Element that should not be deleted/ revised include redlined Sections in the draft Element: 2307 (community planning and development priorities), 2308.2 (infrastructure constraints), 2308.5 (protection of existing residential areas) 2311.8 (consistency with the FLUM, zoning), 2309.9 (school overcrowding), 2308.10 (protection of public spaces), 2308.12 (traffic), and 2308.13 (parking).

tious goals for new affordable housing units in our area will not be achieved solely through traditional programs such as Inclusionary Zoning (IZ), which designates a token proportion of market-rate buildings as affordable. The Plan should recognize the Chevy Chase Gateway’s opportunities and limitations by stimulating partnerships and coalitions of developers, both non-profit and for-profit. Furthermore, the Plan should state the need for significant City participation through contributing resources, e.g., by providing financing from the Housing Production Trust Fund or making public property available for affordable housing. The value created by allowing greater density belongs to residents of the District, and they should use that asset to the fullest in furthering affordable housing objectives.

Defining “Affordable” and “Moderate-Income” Housing

The Comprehensive Plan defines “affordable housing” as “housing in which occupancy is *limited* to households meeting special income guidelines.”³⁸ (Emphasis added.) There are various levels of affordability as a percentage of the Median Family Income (MFI), which in 2019 was \$121,300 for a family of four.³⁹

The Mayor’s October 15, 2019 Housing Equity Report further explains that “dedicated affordable housing is defined as income- and rent-restricted housing supported or subsidized by local and federal programs for households ranging from extremely low-income earning less than 30 percent of the Median Family Income (MFI) up to households earning less than 80 percent of the MFI.”⁴⁰ Maximum and minimum income limits, rents, and purchase prices for dedicated affordable housing are all based on the MFI and adjusted for household size.⁴¹

Importantly, rent-controlled housing does not fall within the definition of “affordable,” because occupancy is not limited to households that meet the income standards. Thus, although many of the rental units along Connecticut Avenue south of Livingston Street are affordable — in that their rents would not exceed 30% of lower-income family income — they are not counted as affordable in the Plan because they carry no formal income restrictions. Indeed, policies that remove these rent-controlled units will increase the demand for affordable units and exacerbate the problem.

³⁸ Page 3.

³⁹ See Inclusionary Zoning 2019 Maximum Income, Rent and Purchased Price Schedule, effective June 28, 2019, at <http://bit.ly/363ug3t>.

⁴⁰ See the Mayor’s October 15, 2019 Housing Equity Report, page 6, at <http://bit.ly/2phiFxW>.

⁴¹ See <https://dhcd.dc.gov/service/rent-and-income-program-limits> for more information.

Along with “affordable” housing, the City prioritizes “moderate-income” (previously “workforce”) housing. Moderate incomes are defined as 80-120% of MFI.⁴² In the section on “Encouraging Home Ownership,” the Housing Element “support[s] paths to homeownership that build and sustain equity and develop assets for the transfer of inter-generational wealth, especially for low and moderate-income households,” and encourages Employer Assisted Housing programs “designed to encourage employees to live close to their work to reduce travel time and cost, and increase their quality of life.”⁴³

Comprehensive Plan Proposals Are Based on Three Assumptions About Housing

The Task Force identified three premises, each centered on housing, that underlie the proposed amendments to the Comprehensive Plan. First, based on the Framework Element that the Council adopted, the Housing Element assumes that **the District’s population will grow by 30% to almost one million by 2045**, thus requiring an increase in housing supply sufficient to slow the rising costs of market rate-rental and for-sale housing.⁴⁴

Second, the Mayor’s Housing Equity Report states that **the District has a significant housing affordability crisis, related to historic social equity issues**, that should be addressed by more equitable distribution of dedicated affordable and moderate-income housing throughout the City. It finds that

Washington, DC’s current supply of dedicated affordable housing is concentrated in some areas of the city and almost non-existent in others, restricting low-income residents’ choice and opportunities of where to live in the District.⁴⁵

The Report states that Rock Creek West — which includes ANC 3/4G and five other ANCs — has only 470 formally dedicated affordable units (as explained above, this figure does not include rent-controlled units). Because this area has the lowest number of such units across the District, the Report sets a “Dedicated Affordable Housing Production Goal” of 1,990 new units for Rock Creek West by 2025.⁴⁶ The Report discusses how OP intends to meet this goal.

⁴² See the Housing Equity Report, Appendix 1.

⁴³ See the proposed Housing Element, pages 60-62, at <https://bit.ly/2TVh>

⁴⁴ Page 19.

⁴⁵ See the Housing Equity Report, page 4.

⁴⁶ See also the Housing Element at page 64, Table 5.6.

For Rock Creek West, the new affordable housing goals are greater than the total housing goals because the affordable housing goals include not only net new production, but also conversion of existing housing into subsidized housing and voucher recipients living in non-restricted housing. Reaching our goals will require a mix of these strategies, especially in Rock Creek West, where new housing has been extremely limited to date and where land use changes must be made to the Comprehensive Plan to reach these housing goals.⁴⁷

The proposed Housing Element of the Comprehensive Plan tracks with the Housing Equity Report, stating that affordable housing is “a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout all neighborhoods of the city.”⁴⁸ The Housing Element identifies as its first four “critical housing issues”: (1) ensuring housing affordability across all incomes; (2) furthering fair housing opportunities, especially in high-cost areas; (3) fostering housing production to improve affordability; and (4) preserving existing affordable housing. The Housing Element concludes that because

the District remains attractive to and retains higher income households, rising demand and competition will put upward pressure on rents and a greater number of lower-income households will experience greater pressure from rising housing costs. Thus, greater public action is needed to fulfill the vision of an inclusive city.⁴⁹

Third, the proposed amendments assume that privately financed new development will produce a significant number of new affordable housing units without requiring public funds.

One method that DC relies upon to produce new affordable housing is Inclusionary Zoning (IZ), a requirement that all new residential buildings of 10 or more units dedicate 8% to 10% of their residential floor area to affordable units.⁵⁰ Because the measure is *residential floor area*, when implemented it can result in fewer than 8% to 10% of housing units being affordable. In a new building of 200 housing units, a developer could dedicate as few as 16 studios or one-bedrooms to meet the affordability requirement. If

⁴⁷ See the Housing Equity Report, page 12.

⁴⁸ See the proposed Housing Element, page 25.

⁴⁹ Page 2.

⁵⁰ The Mayor has proposed “Expanded Inclusionary Zoning (aka ‘IZ Plus’) [that] would increase this scale to require 10-20% affordable housing for changes to the zoning map that provide greater density.” See OP press release at <http://bit.ly/2O2SnsH>. Even this level of IZ will not produce a significant number of new affordable units in our neighborhood.

the affordable units were sized larger to accommodate families, the developer could meet the IZ requirement with even fewer units.

Examples in Rock Creek West bear this out. The building completed in 2016 at 5333 Connecticut Avenue, NW contains 261 apartments, of which only 19 units are designated affordable. The building proposed for 4615 Wisconsin Avenue, NW, pursuant to a PUD, is slated to contain 41 units, of which only three will be designated affordable.⁵¹ Each building meets IZ requirements for affordable residential floor area but contains only 7.3% affordable units. The Report notes that for the period from 2007 to 2017, Inclusionary Zoning has produced “almost 600 affordable units...with another 800 expected [for the entire District] over the next several years at pace of close to 200 affordable units per year” (at page 10). At that pace, IZ will generate only a small proportion of the goal of 1,990 new affordable units by 2025.

Beyond IZ: Other Tools for Producing Dedicating Affordable Housing

The Housing Element proposes that “suitable regulatory, tax, and financing incentives” be used “to meet housing production goals.” “These incentives should continue to include zoning regulations that permit greater building area for commercial projects that include housing than for commercial projects that do not include housing and relaxation of height and density limits near transit.” In particular, the proposed Housing Element amendments would continue to “evaluate commercially zoned land in the District, focusing on high-capacity surface transit corridors, other arterial streets, and . . . should consider the feasibility of rezoning some of these areas from commercial to mixed-use or residential districts, in order to ensure their future development with housing.”⁵²

The Housing Element amendments aim to build the capacity of the non-profit housing sector by “actively involv[ing] and coordinat[ing] with the nonprofit development sector . . . to meet affordable housing needs, including housing construction and housing service delivery [by] partner[ing] with the non-profit sector so that public funding can be used to leverage the creation of affordable units. . . .”⁵³

The District’s policy under the proposed Housing Element is to “examine and propose greater Inclusionary Zoning requirements when zoning actions permit greater density or change in use. Factors supporting a greater requirement may include high cost areas

⁵¹ The proportion of required affordable units may be greater if the developer seeks greater density. In exchange for increased zoning density to permit a 7.5 story building, a developer has recently proposed to provide just one more affordable housing unit than the law requires. See <http://bit.ly/3617mtP>.

⁵² Pages 20-21.

⁵³ Page 28.

[or] proximity to transit stations or high capacity surface transit corridors.”⁵⁴ The Plan will “prioritize public investment in the new construction of, or conversion to, affordable housing in planning areas with high housing costs and few affordable housing options [and] consider land use, zoning, and financial incentives where the supply of affordable units is below a minimum of 15 percent of all units within each area.”⁵⁵ It will be the District’s policy as well to increase the number of “larger family-sized housing units for families with children” through “both ownership and rental.”⁵⁶ The District will “research land use tools and techniques, including development standards, to encourage the development of residential units that meet the needs of larger families, with a focus on financing of affordable units in high cost areas.”⁵⁷

In its Plan amendments, the Office of Planning quantifies higher affordability objectives for publicly owned sites, “requir[ing] that 20 to 30 percent of the housing units built on publicly owned sites . . . are reserved for a range of household incomes,” with priority for “the provision of affordable housing in areas of high housing costs.”⁵⁸ With respect to public facilities — e.g., the Chevy Chase Public Library — the Plan seeks to “co-locate private and public-uses if possible whenever the District seeks to modernize, expand, or build new public facilities. Co-located uses should align with citywide priorities and can include affordable senior housing, affordable multi-family housing, recreation facilities, and health-related facilities.”⁵⁹

These policies supporting affordable and moderate-income housing appear to be reflected in the proposed Rock Creek West Area Element. “Increasing the production of affordable and moderate income units in Rock Creek West is a priority.”⁶⁰ It will be the District’s policy to

recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Map. When such development is proposed, [the developer should] work with ANCs, residents, and community organizations to encourage mixed-use projects that combine

⁵⁴ See proposed Housing Element, page 33.

⁵⁵ Page 34.

⁵⁶ Page 36.

⁵⁷ Page 37.

⁵⁸ Page 27.

⁵⁹ See the proposed Land Use Element, page 69, at <https://bit.ly/2NX5awm>. Also, the West End Public Library includes a residential building with 164 units, but 71 of those units are “luxury residence” condos and only 93 are rental units, none of which are designated as affordable. Such a development at the Chevy Chase Public Library would not align with city priorities.

⁶⁰ See the proposed Rock Creek West Area Element, page 5, at <http://bit.ly/2JCgwnD>.

housing, including affordable housing, neighborhood-serving retail, and commercial uses.⁶¹

That policy is further specifically applied to the Connecticut Avenue corridor: “Recognize the opportunity for additional housing, including new affordable and moderate income units, with some retail and limited office space along the Connecticut Avenue corridor.”⁶²

The Task Force Reached Six Conclusions About Affordable Housing

Based on the analysis above, the Task Force reached six key conclusions. First, **the Task Force supports the goal of providing more dedicated affordable and moderate-income housing in ANC 3/4G.** And even though “rent-controlled” does not count as “dedicated affordable housing,” the Task Force recognizes the need to maintain the existing extensive inventory of affordable “rent-controlled” housing already in place along the Connecticut Avenue corridor.

The Task Force is concerned that the proposed Plan amendments do not provide enough real planning specificity or thoughtful organization and vision **to achieve affordable housing production goals and preserve existing affordable housing, including rent-controlled units.** Inclusionary Zoning may be an effective tool in very large developments with more market-rate units to offset the cost of providing affordable and moderate-income housing. The economics of IZ are more difficult, however, in smaller buildings that can at best produce only a few affordable units. Inclusionary Zoning — i.e., using market-rate units to subsidize affordable units — simply cannot be the primary source to achieve the number of affordable units that the Comprehensive Plan contemplates for our neighborhood.⁶³

The Task Force suggests that a more effective way to create affordable and moderate-income units in our neighborhood may be through partnerships that include non-profit developers who are not constrained by the same economics that control traditional, for-profit projects. Rather than the small number of units that might be economically possible under a PUD, a coalition of non-profit developers and builders could undertake mixed-income projects that could achieve a much higher percentage of affordable units in smaller-scale projects that are suitable for the Chevy Chase Gateway area.

⁶¹ Page 18.

⁶² Page 30.

⁶³ The Comprehensive Plan amendments to not allocate the Housing Equity Report’s goal of 1990 new affordable units in Rock Creek West by 2025 to particular neighborhoods, so there is no specific goal applicable to ANC 3/4G. Given the long timeline for projects like this, it is unlikely that significant new affordable housing projects in our neighborhood can be completed by 2025. Nevertheless, the Task Force agrees that we must start the process that may not come to fruition in the near term, and we should aim to develop a significant number of new affordable and moderate-income housing units.

Such projects can create more affordable and moderate-income units than reliance on IZ alone but will certainly require subsidies in various forms. **The Task Force urges the City to use its Housing Production Trust Fund and District-owned property to support projects in high-cost neighborhoods like ours.** Where possible, District property — e.g., the Chevy Chase Library — should be leveraged so that mixed-income affordable housing can be built without incurring high land acquisition costs. The District may own other property in Rock Creek West that can be identified for residential development. In some instances, the District might acquire land to be used for mixed-income affordable housing. “Sweat equity” is also a powerful way to get the community involved and to integrate new developments into the fabric of the neighborhood.⁶⁴

The Task Force agrees that the ultimate objective of affordable housing should be to enable low-income residents to build wealth. IZ rental units do not give residents any equity that can accumulate over time. Moreover, IZ units are not typically designed for families. The Comprehensive Plan should do more to encourage ownership for families, which can be the backbone for cohesive communities. The Small Area Plan for the Chevy Chase Gateway should encourage ownership of affordable and moderate-income housing for families. Covenants should require that the unit remain “affordable” for at least 15 years.

Finally, the Task Force advocates preserving rent-controlled units to avoid cannibalizing existing affordable housing and creating the false impression of having produced additional affordable units. The result of moving existing affordable housing from one column to another with no net gain means displacing one set of vulnerable residents for a more vulnerable group. Conversions of rent-controlled units are likely to take the pressure off building new affordable units, but no real gain will be achieved. Instead, rent-controlled units should be preserved. As stated above, preserving existing affordable housing is one of four critical strategies identified in the proposed Housing Element for enabling people of all incomes to live in all neighborhoods of the city. Preserving rent-control units not only promotes a stable source of affordable housing, but also saves taxpayer money, as voucher rents are typically higher than rents charged for comparable rent-controlled units because voucher rents are based on surveys that include unregulated units. Voucher rents in Chevy Chase would be comparable to those in Cleveland Park, which, according to the DC Housing Authority, range from \$2,520 per month for a studio to \$3,113 per month for a two-bedroom unit (utilities included).

D. Specify Plans for School Facilities as a Predicate for Growth

⁶⁴ The Chevy Chase community has demonstrated its willingness to support projects that benefit the neighborhood. When the historic Avalon Theater was threatened to be closed, residents pitched in and purchased the Theater and have run it as a non-profit. A similar commitment could be marshaled to support a more diverse community.

Schools form a core for neighborhood strength and growth. As the Plan notes, “continuing to improve our schools is fundamental in meeting the goal of retaining and attracting households with children. Schools strongly define the social, economic, and physical characteristics of our neighborhoods.”⁶⁵ “The District’s schools have been anchors for the community at large, serving as neighborhood gathering places.”⁶⁶ “Schools can be leveraged as anchors and cultural assets for District neighborhoods—community hubs that can serve local needs beyond their core educational mission and use.”⁶⁷

Recognizing the important function that schools play, the proposed Plan identifies as a “crucial educational facilities issue” “continuing to plan for and investing in new and existing school facilities to meet the District’s growth.”⁶⁸ One “overarching goal for educational facilities is . . . to provide facilities that accommodate population growth.”⁶⁹

The Plan notes the substantial investments in school facilities in the past decade. Nevertheless, it acknowledges “where additional DCPS [District of Columbia Public Schools] school capacity is needed to satisfy enrollment demand and to avoid overcrowding, DCPS may need to consider existing site capacity, site acquisition, and new school development, in addition to school boundary and enrollment adjustments.”⁷⁰

Rock Creek West already is facing a crisis in public school capacity.⁷¹ The DC Master School Plan for 2018 found that “enrollment in Wards 2 and 3 outstrips capacity today, and the gap will continue to grow over the next ten years in the absence of DCPS facility expansion.”⁷² The two most crowded schools of any kind in the DCPS system are Wilson High School and Deal Middle School; the most crowded elementary school is Lafayette Elementary. Together, these three schools form the DCPS Wilson High School Feeder Pattern, which governs all of ANC 3/4G. Each exceeds the next closest school of its kind, not only in enrollment, but also in listed school capacity: Wilson at 1,796 enrollment vs. 1,600 capacity, Deal at 1,507 enrollment vs. 1,200 capacity, and Lafayette at

⁶⁵ See the proposed Educational Facilities Element, page 4, at <http://bit.ly/34ZAjWO>.

⁶⁶ See page 30.

⁶⁷ See pages 30-31.

⁶⁸ See page 2.

⁶⁹ See page 4.

⁷⁰ See page 17.

⁷¹ In school year 2018-2019, there were no public charter schools in Rock Creek West (Educational Facilities Element, page 12, Map 12.2; DC Master School Plan 2018, pages 3-26, Table 3-12, at <http://bit.ly/38dJjcN>), though there are a number of private schools (Educational Facilities element, page 22, Map 12.3).

⁷² See Educational Facilities Element, Figure 3.12 and Table 3.10.

887 enrollment vs. 805 capacity.⁷³ Lafayette, which completed a major renovation and expansion by school year 2016-17, is already at overcapacity again and is slated for additional renovation and expansion based on increasing enrollment: approximately 940 students are projected for school year 2020-21.

The Wilson High School Feeder Pattern Community Working Group (CWG) paints a dire picture:

The CWG and members of the broader Wilson High School feeder pattern community have advocated for adding a new elementary, middle, and/or high school to the Wilson High School feeder pattern. This could include new construction, utilizing available or underutilized space, or leasing or purchasing public/private space.

DCPS does not have currently available facilities within Ward 3, so any added capacity beyond existing school modernizations or expansions in the short term would require construction or acquisition of property. While the group didn't explore options in detail at the elementary, middle, or high school level, they noted the following considerations:

- A new elementary school would help relieve, but not solve, overcapacity issues at the primary level. Given the extent of capacity needed and the distribution of need across the feeder pattern, the group emphasized that multiple new spaces would be needed at the elementary level, if not combined with other solutions.
- A new middle school would solve the long-term overcapacity issues at Deal.
- A new high school would solve the long-term overcapacity issues at Wilson.⁷⁴

The proposed Rock Creek West Area Element acknowledges the problem of school overcrowding but offers no specific plan for solutions. Instead, it promotes changes in density to facilitate new development and an increase in population, thereby worsening the problem. In the proposed policy for "Schools and Libraries," OP inexplicably deletes the planning policy that "approval of any residential development" should consider whether it "could further exacerbate school overcrowding" (Rock Creek West

⁷³ See the DCPS School Year 2018-2019 Enrollment Audit data, at <https://osse.dc.gov/node/1390091>.

⁷⁴ See the February 2019 Wilson High School Feeder Pattern Community Working Group (CWG) Summary Report, pages 28-29, at <http://bit.ly/2JADBcM>.

Area Element at 24). While the draft amendments to the Educational Facilities Element acknowledge that “changes to school service boundaries, and the expansion of existing school facilities, and/or development of additional school facilities should be aggressively pursued to ensure that school overcrowding is proactively addressed,” nothing in the Comprehensive Plan specifically addresses a solution to the acute need for more public school capacity in Rock Creek West. Given the known school overcrowding crisis, the new development contemplated by the increased density in the Comprehensive Plan would have an unacceptable impact absent new construction to alleviate the current problem and to address the coming demand.

The proposed Comprehensive Plan amendments are driven by expectations of substantial growth over the next decades — e.g., a projected population of 987,200 by 2045.⁷⁵ It may be prudent to consider reasonable scenarios based on population increases similar to or exceeding the District’s recent experience. Nevertheless, such expectations should be tempered by the realistic constraints imposed by limited space for new development and the need for expanded infrastructure on an unprecedented scale to support such growth. The proposed amendments do not provide sufficient specific plans for infrastructure — particularly public schools — to permit growth at the projected pace.

Director Trueblood advised the ANC at its December 9, 2019 meeting that it was DC Public Schools’ responsibility to plan for new public school facilities, and DCPS could use the data in the Comprehensive Plan to make those decisions.⁷⁶ It is not a viable approach to leave the specific planning for school location and funding to a separate DCPS process when population growth and schools are so integrally entwined. The existing public schools in this community are one of its strengths. Ward 3 — most of Rock Creek West — has the highest proportion of children of any Ward in the District,⁷⁷ and young families are continuing to move into this area because of its schools. As schools become more overcrowded and are no longer attractive, the population will not grow, and the vibrancy of the neighborhood might decline. The Rock Creek West Area needs to expand its DCPS options to remain vital.

The only property that DCPS owns in Rock Creek West that is not used as a public school is the old Hardy School at 1550 Foxhall Road, NW, which is currently leased to a private school (the Lab School of Washington). Although the overcrowding crisis is acute, DCPS has not identified any location or plan for acquiring or expanding space to accommodate currently expected growth based on DCPS’s own projections. It is not rea-

⁷⁵ See the Framework Element, page 39, Table 2.2, at <http://bit.ly/38wkzN9>.

⁷⁶ Director Trueblood said that plans for new schools would be reflected in the annual Capital Improvements Plan. That FY 2019 Plan (available at <http://bit.ly/2PAQCmr>) includes some funds for modernization and renovation of some public schools in Rock Creek West, but does not contain projected funding for capacity that will meet currently projected demand, much less the rate of growth that is predicted for the proposed Comprehensive Plan amendments.

⁷⁷ See “District of Columbia 2010 Population by Single Age by Ward,” at <http://bit.ly/2PFJnte>.

sonable or prudent for the Comprehensive Plan to expect significant population additions — particularly in affordable and moderate-income housing — that will not increase public school enrollment even beyond current estimates. Nor is it reasonable or prudent to encourage and promote population growth without any firm plan for where and when to build new schools.

The Comprehensive Plan amendments, including specifically the proposed increased land use density at Connecticut Avenue, are fatally deficient without specific plans to address the inevitable shortage of public educational facilities in Rock Creek West based on the expected — and promoted — growth in the number of children, including plans to fund expansion and to acquire land, as needed. The Education Facilities and the Rock Creek West Area Element should be further amended to address this serious deficiency.

Appendix A. Background for the Task Force's Process

OP submitted the Framework Element to the Council in January 2018. The Council held a 13-hour hearing on this Element on March 20, 2018, and ANC 3/4G submitted testimony (<http://bit.ly/2MSuCD8>) urging the Council to address concerns (1) by modifying OP's population growth projections not only to account for infrastructure constraints that will diminish unbridled growth, but also to preserve neighborhoods and communities, and (2) by eliminating OP's unnecessary and counterproductive attempts to dilute the Comprehensive Plan with so-called "flexibility."

On July 2, 2019, the Council released a number of changes to OP's proposed Framework Element and passed it on first reading on July 9, 2019. On July 22, 2019, the Commission adopted a resolution (<http://bit.ly/2pkWKGe>) acknowledging some appropriate revisions and what it considered to be significant improvements over OP's proposal. The Commission reiterated its concerns about OP's population growth methodology and projections and its failure to consider the impact that such a population expansion would have on the District's infrastructure and livability if it actually occurs. The Commission also objected to the short time between the Council's changes and its adoption on first reading. On October 8, 2019, the Council passed the Framework Element (<http://bit.ly/2pb6LWB>), and it became law.

On October 15, 2019, OP released its proposed amendments to the remaining elements of the Comprehensive Plan. The full draft Comprehensive Plan is available at <https://plandc.dc.gov>, and the summary of the plan for Rock Creek West is at <http://bit.ly/36gFgLM>. OP held public meetings in each ward to discuss its proposal and answer questions — in Ward 4 on November 19, 2019, and in Ward 3 on December 7, 2019. OP set December 20, 2019, as the deadline for individual comments on its proposed changes, and ANC resolutions were to be filed by January 31, 2019. On December 16, 2019, OP announced an extension of the deadline for individual comments until January 10, 2020, and for ANC resolutions until February 14, 2020.

On October 28, 2019, ANC 3/4G created a Comprehensive Plan Task Force to study OP's draft, to gather information from the community, and to make recommendations to the Commission. The 12-person Task Force consisted of commissioners, residents, and business owners,⁷⁸ but all interested parties were invited to participate in the

⁷⁸ The members of the Task Force were: (1) Commissioners Randy Speck (chair of the Task Force), Dan Bradfield, Jerry Malitz, and Chris Fromboluti; (2) residents Jonathan Guy, Linda Komes, Ron Eichner, Andrea Rosen, and Allen Seeber; (3) business representatives David Kim (Circle Wine & Spirits) and Tim Walsh (Capital Crab & Seafood and The Avenue). Marelise Voss also contributed to the report.

process. The Task Force decided to conduct a survey to solicit input from the broader community and held five public meetings so that it could provide a report with recommendations to the full Commission. The Commission may then consider resolution proposals at its January 27, 2020 meeting for final adoption at its February 10, 2020 meeting.

The ANC and the Task Force conducted a robust public engagement with residents. Seventy-five people attended the ANC's initial October 28, 2019 meeting discussing the Comprehensive Plan amendments; as of January 2, 2020, another 94 viewed all or part of that meeting on the ANC's YouTube channel (<http://bit.ly/2SU3Z4j>). The ANC also invited Director Trueblood from OP to its December 9, 2019 regular meeting, where he provided additional information about the Comprehensive Plan and answered questions from commissioners and residents.⁷⁹ Thirty-five people attended that meeting, and 85 have viewed it on YouTube.

The Task Force held public meetings on November 12, November 21, December 2, December 16, 2019, and January 23, 2020. Multiple notices for each meeting were posted on the ANC's website, on all neighborhood listservs, and in Facebook groups. In addition to Task Force members, between 25 and 70 residents attended each of these meetings. OP staff attended the November 12, 2019 Task Force meeting as well and subsequently were available to answer questions by email. The December 16, 2019 (61 YouTube views) and January 23, 2020 meetings were recorded and posted on the ANC's YouTube channel (<https://youtu.be/9W3tM5f0-pY> and <https://www.youtube.com/watch?v=HF7nfmRXx14>). In order to give the community an opportunity to comment on its analysis and conclusions, the Task Force posted its draft of this report on the ANC 3/4G website and posted links on neighborhood listservs and in Facebook groups prior to the January 23, 2020 meeting. Finally, the Task Force monitored numerous posts on listservs and in Facebook groups expressing views about the Comprehensive Plan. These varied venues gave ANC 3/4G residents multiple opportunities to give the Task Force their views. The ANC also contacted and met with other Ward 3 and Ward 4 ANCs to share information and approaches.

On December 2, 2019, the Task Force initiated a short online survey to solicit the community's views on various aspects of the Comprehensive Plan. The survey was developed by the Task Force and included both demographic and substantive questions. The survey closed on December 20, 2019, with 682 complete responses. The survey details and results are reported in Appendix C.

⁷⁹ Director Donaldson from the Department of Housing and Community Development was invited to this meeting but could not attend. In addition, Task Force members took advantage of other opportunities to engage with OP at its community meetings for Ward 4 on November 21, 2019, and for Ward 3 on December 7, 2019.

Appendix B. Community Survey Methodology

The Task Force developed an eight-question online survey using the QuestionPro platform. The first three questions asked for demographic data — age, voting precinct as a surrogate for location, and length of time residing at current location — that could be used to ensure that the survey respondents were reasonably representative of the community and to determine whether different demographics have different views. The remaining questions asked about the factors that make for a successful neighborhood (using the same categories that OP used in its Values Campaign Survey), factors that the Comprehensive Plan should address for the Chevy Chase DC area, preferred modes of transportation, preferences for the type of housing that should be added to the Chevy Chase DC area, and types of development in Chevy Chase DC that are appropriate over the next few years. The survey was expected to take eight to ten minutes to complete.

The Task Force announced the survey mid-day on December 2, 2019, and it remained open for 18½ days until midnight on December 20, 2019. The Task Force used a number of methodologies to enhance our community outreach and to encourage participation: (1) the ANC’s monthly newsletter (924 subscribers) and one commissioner’s individual monthly newsletter (900 subscribers); (2) multiple posts on the Chevy Chase Community listserv (5228 members), NextDoor for the neighborhoods in our ANC (East Chevy Chase, West Chevy Chase, Upper Chevy Chase, Hawthorne, and Barnaby Woods) (3936 members), and Chevy Chase GoogleGroups (437 members); (3) multiple posts on the ANC’s Facebook page (500 followers), (4) posts on the ANC’s website and one individual Commissioner’s website, (5) multiple posts on the Lafayette Elementary School’s Facebook page (1,000 members), in the Lafayette Unofficial Facebook group (378 members), and in the Chevy Chase Chatter Facebook group (471 members), and (6) multiple emails by individual Task Force members to residents.

By the close of the survey, 682 individuals had completed the survey.⁸⁰ To put that level of response in context, census data shows that ANC 3/4G has a total population of about 15,000 people (about 20% of whom are children). That yields an overall response rate of 4.55%, which is high for such surveys. By comparison, OP’s short survey that it relied on as part of the data for the proposed Comprehensive Plan amendments was open electronically for 14 weeks and included 24 public meetings where participants were asked to complete the survey after hearing a presentation. OP’s survey had 2,763 total respondents — including both District residents and those from outside the District. Of those, 941 completed the survey in-person, which creates an inherent level of bias based on what they just heard in a meeting, and 1,822 on-line responses. Only a total of 570 re-

⁸⁰ A careful check of IP addresses identified no anomalies that would suggest multiple responses by the same individual.

spondents in OP's survey were from Wards 3 and 4 combined. The population of those Wards is approximately 150,000 people (about 17% of whom are children), for a response rate of 0.38%. The demographics of the respondents between the two surveys are very similar as measured by the two characteristics that were asked on both surveys — age and length of time in DC/residence. In sum, the results for the Task Force's more specific survey are significantly more representative of this community's views than OP's general survey.

Appendix C presents the detailed results from the survey, both in the aggregate and cross tabulated by demographic categories. With respect to the age of respondents, the largest group was between ages 36 and 45, but each age group was well-represented. The substantial majority of respondents — almost 70% — voted at either the Chevy Chase Community Center or Lafayette Elementary School, but other areas were reasonably represented as well. Most respondents — 59% — have lived in their current locations more than ten years, but almost a quarter had lived in their current address less than five years, so there was reasonable participation by both long- and short-term residents.

Appendix C. Community Survey Results

Question 4 in the survey asked respondents to rank the characteristics that OP proposes as measures of a neighborhood's success (Land Use Element at 34-35) which corresponded to the categories used in OP's Values Campaign Survey. Respondents ranked these characteristics from most important to least important (the lower the number the greater important) as follows:

1. Quality public services (e.g., police, fire protection, safe and modernized schools, conveniently accessed libraries and recreation centers) (average rank 3.20);
2. Easy access to shops and services to meet day-to-day needs, such as childcare, groceries, and sit-down restaurants (3.59);
3. Safe, clean public gathering places (e.g., parks and plazas), to meet neighbors for children to play, and to exercise or connect with nature (4.15);
4. Transportation options for those without a car, including convenient bus service and safe access for pedestrians (4.41);
5. A healthy natural environment, with street trees and greenery, and easy access to the city's open space system (4.86);
6. Evidence of visible public maintenance and investment, proof that the city "cares" about the neighborhood and is responsive to its needs (5.07);
7. Distinctive character and a "sense of place," (e.g., neighborhood architecture, landmarks and vistas, streets, public and historic places) (5.11); and
8. Housing choices throughout DC, including affordable homes for renters, owners, and a range of units meeting different community needs (5.53).

There were no significant differences among demographic groups.

Question 5 asked respondents how important it was for the Comprehensive Plan to address particular topics. Respondents indicated the degree of importance from "very important" to "not at all important." Although all categories (except Micromobility Services) were considered at a minimum "important," those categories that were ranked "very important" in order were as follows:

1. Pedestrian, Bicyclist and Road Safety (62.35% of respondents indicating it is "very important");

2. Public School Available Space in the Neighborhood (60.79%);
3. Environmental Qualities (54.85%);
4. Maintaining Community Character (52.35%);
5. Maximum Building Height and Size (49.05%);
6. Street Lighting (42.79%);
7. Dedicated Parking for New Buildings (39.47%);
8. Enhanced Public Transportation (35.49%);
9. Recreation Facilities (34.17%);
10. Preservation of Historic Buildings (33.68%);
11. On and Off Street Parking (32.94%);
12. Decreasing Traffic Congestion (29.12%);
13. Public Space Landscaping (28.63%);
14. Neighborhood Diversity (21.35%);
15. Affordable Housing (20.32%);
16. Workforce Housing (17.13%); and
17. Micromobility Services (e.g., Scooters, Bicycles) (7.36%).

When ranked by average score (with 1 being “very important” and 5 being “Not at all Important”), the topic ranking was similar, with 16 of the 17 factors all receiving an average ranking that indicated respondents considered them at a minimum “important (3.0 or lower)”:

1. Pedestrian, Bicyclist and Road Safety (1.66 average rating);
2. Public School Available Space in the Neighborhood (1.69);
3. Environmental Qualities (1.69);

4. Maintaining Community Character (1.93);
5. Street Lighting (1.98);
6. Recreation Facilities (2.08);
7. Public Space Landscaping (2.19);
8. Maximum Building Height and Size (2.20);
9. Enhanced Public Transportation (2.25);
10. Preservation of Historic Buildings (2.36);
11. On and Off Street Parking (2.38);
12. Dedicated Parking for New Buildings (2.45);
13. Decreasing Traffic Congestion (2.51);
14. Neighborhood Diversity (2.70);
15. Workforce Housing (2.94);
16. Affordable Housing (3.08); and
17. Micromobility Services (e.g., Scooters, Bicycles) (3.67).

Question 6 asked about preferred modes to travel from home to a job, shopping, or government service (e.g., community center, library). Respondents ranked their preferences as follows (with multiple choices permitted):

1. Walking (22.69%);
2. Driving (19.265);
3. Metrorail (16.88%);
4. Bus (16.06%)
5. On-Demand Transportation (11.03%)

6. Bicycle (personal) (10.06%)
7. Micromobility (e.g., Scooter, Bicycle, Moped) (3.82%)

Question 7 asked what type of housing the Comprehensive Plan should add more of to the Chevy Chase DC area. The 3 choices were: affordable housing, senior housing, and workforce housing (e.g., teachers, librarians, police, fire). Respondents selected each group almost equally. When asked more specifically about the type of development that they preferred for affordable, senior, and workforce housing, respondents indicated their preferences as follows:

Affordable Housing

1. 2-3 story walk-up/mixed-use (23.02%);
2. Townhouses/Duplexes (20.57%);
3. 4-5 story mid-rise/mixed-use (17.57%);
4. Single-family detached (16.88%);
5. Accessory apartment in or behind house (14.2%); and
6. 6 plus story high rise/mixed-use (7.83%).

Senior Housing

1. 4-5 story mid-rise/mixed-use (26.21%);
2. 2-3 story walk-up/mixed-use (21.65%);
3. Townhouses/Duplexes (17.29%);
4. Accessory apartment in or behind house (15.15%);
5. Single-family detached (10.50%);
6. 6 plus story high-rise/mixed-use (9.20%).

Workforce Housing

1. Townhouses/Duplexes (23.60%);
2. 2-3 story walk-up/mixed-use (23.31%);
3. 4-5 story mid-rise/mixed-use (17.65%);
4. Single-family detached (17.20%);
5. Accessory apartment in or behind house (10.87%); and
6. 6 plus story high-rise/mixed-use (7.37%).

Appendix D. Communications With OP Regarding Practical Implications of Proposed FLUM Changes

The Task Force was uncertain about what the proposed land use redesignation in the FLUM of Connecticut Avenue from Chevy Chase Circle to Livingston Street means in practical terms. In an effort to get a definitive answer, the Task Force asked OP for its view. On November 21, 2019, Erkin Ozberk, Senior Neighborhood Planner, advised the Task Force that

the most commonly used zone typically associated with Main Street Mixed Use [sic] Corridor designations [proposed for this section of Connecticut Avenue] on the Generalized Policy Map (GPM) and low-density commercial/moderate-density residential on the FLUM would include MU-4, which entails the height and density provisions outlined [i.e., with a Planned Unit Development (PUD), a Floor Area Ratio (FAR) of 3.6 (of which 2 FAR can be non-residential) and a height of 65 feet, plus a 15-foot penthouse].

The current zoning for this area is MU-3A, which already permits mixed-use buildings, but of low density, 40 feet high, and a FAR of up to 1.2.⁸¹ Thus, a change to MU-4 could have a significant impact in terms of future development. In a November 22, 2019 email, however, Mr. Ozberk indicated that even the limits of the MU-4 zone were not strict limits and could be exceeded. He noted that there are

three areas currently with the same GPM/FLUM designations as that proposed for Connecticut Avenue north of Livingston. In those three areas, the zoning is MU-4 on 14th Street, MU-4 and NC-7 and on Georgia Ave/Upshur Street, and NC-14 and NC-15 on H Street NE. So, while MU-4 is the most commonly used zone typically associated with this designation, *other zones may apply (particularly through the PUD process)*. Meanwhile, in the Framework Element approved by Council in October, the MU-4 zone is identified as an *example* for the low density [sic] commercial land use category. (Emphasis added.)

Looking for further clarification, the Task Force contacted Jennifer Steingasser, OP's Deputy Director for Development Review and Historic Preservation, who explained, in a December 4, 2019 email, that "other zones" that are not moderate-density would be considered only as part of a PUD, which requires a showing that the development is "not inconsistent" with the Comprehensive Plan.

⁸¹ Because this area is already zoned for mixed use, residential units — including affordable housing — can be built within these limitations without any change to the FLUM. Moreover, a developer could ask the Zoning Commission to approve a PUD that would provide additional affordable units in return for greater density without any change to the FLUM.

While the Task Force understands that is the controlling standard, OP has not been able to explain exactly what “not inconsistent” with the Comprehensive Plan means. The revised Framework Element, Section 227.2, does provide, however, that “Under the Zoning Regulations, a proposed Planned Unit Development should not result in unacceptable project impacts on the surrounding area.”