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**ANC 3/4G Testimony before the
Committee of the Whole on the
Comprehensive Plan Amendment Act of 2020
November 12, 2020**

Thank you Chairman Mendelson and Councilmembers for this opportunity to address proposed changes to the District’s Comprehensive Plan, the “Comprehensive Plan Amendment Act of 2020,” Bill 23-736. I am Randy Speck, Chair of ANC 3/4G, and I submit this testimony on behalf of our Commission, which approved it by a vote of 4 to 0 on November 9, 2020 (a quorum being 4). We generally support the significant aspects of the proposed amendments related to the “Chevy Chase Gateway” (i.e., the Connecticut Avenue corridor from Chevy Chase Circle to Livingston Street, NW). These provisions mostly align and are consistent with the Commission’s recommendations and will provide guidance for any future development in that specified area. While we have significant reservations about some of the other proposed Comprehensive Plan elements,

we do not oppose the Council’s approval of Bill 23-736 based on representations that the Comprehensive Plan will be completely rewritten by 2025.¹

Since March 2018, our Commission has actively reviewed and commented on proposed Comprehensive Plan amendments.² The Commission’s comments have focused particularly on recommended changes to the Future Land Use Map that would permit mixed-use, low-density commercial and moderate-density residential development along the Chevy Chase Gateway.³ The ANC’s February 10, 2020 resolution supported these proposed changes but with an essential proviso:

that [the Office of Planning] include a provision in the Comprehensive Plan that the Zoning Commission may not approve any proposed density changes until completion of a Small Area Plan. The Small Area Plan should be a prerequisite so that new development will be consistent with that Plan.⁴

The Office of Planning accepted this condition and revised the Generalized Policy Map accordingly to identify the Chevy Chase Gateway as part of a “Future Planning Analysis Area” defined as

areas of large tracks or corridors where future analysis is anticipated to ensure adequate planning for equitable growth. . . . Planning analyses usually include, but are not limited to, *Small Area Plans*, Development

¹ See Staff Report from the Director of the Office of Planning to District of Columbia Council Members, April 2020, page 8, available at <https://bit.ly/3jPCT8l>.

² “ANC 3/4G Testimony before the Committee of the Whole on the Comprehensive Plan Framework Amendment Act of 2018,” March 20, 2018, available at <https://bit.ly/2MSuCD8>; “ANC3/4G Resolution Regarding the Comprehensive Plan Amendments Act of 2019 (B23-0001),” July 22, 2019, available at <https://bit.ly/2GkpIhS>; “Comprehensive Plan Task Force Report and Recommendations,” January 23, 2020, available at <https://bit.ly/324DWex>; “ANC 3/4G Resolution Requesting Changes to the Office of Planning’s Proposed Amendments to the Comprehensive Plan,” February 10, 2020, available at <https://bit.ly/2Ir1Gzb>.

³ Future Land Use Map, April 2020, available at <https://bit.ly/2JtU1nE>.

⁴ “ANC 3/4G Resolution Requesting Changes to the Office of Planning’s Proposed Amendments to the Comprehensive Plan,” February 10, 2020, paragraph 9, available at <https://bit.ly/2Ir1Gzb>.

Frameworks, Technical Studies, Retail Strategies, or Design Guidelines. Such analysis should precede any significant zoning change in this area. The planning process should evaluate current infrastructure and utility capacity against the full build out and projected population growth. Planning should focus on issues most relevant to the community that can be effectively addressed through a neighborhood planning process.⁵

Consistent with the Generalized Policy Map, the approved FY 2021 Budget included \$150,000 for the Office of Planning to prepare a Small Area Plan for the Chevy Chase Gateway.⁶ That approved budget was executed, and work has already begun.⁷ Thus, the proposed Comprehensive Plan amendments related to the Chevy Chase Gateway have incorporated that aspect of our Commission’s recommendations, and we support that portion of the Plan.

Our Commission also supports the Comprehensive Plan’s goals for more affordable housing along the Chevy Chase Gateway. We have repeatedly suggested that any new development along the Connecticut Avenue include a significant number of affordable housing unit — e.g., above the new Chevy Chase Community Center and the new Chevy Chase Neighborhood Library as well as on current privately owned sites such as Safeway, Wells Fargo Bank, and the WMATA bus depot. The Commission’s Task Force on Racism is currently working on specific recommendations to address these affordable housing objectives. The Comprehensive Plan amendments related to the

⁵ Generalized Policy Map, April 2020, available at <https://bit.ly/2TvxCZ6> (emphasis added).

⁶ Fiscal Year 2021 Approved Budget and Financial Plan, August 27, 2020, page B-79, available at <https://bit.ly/3bVYeKO>.

⁷ “Chevy Chase Small Area Plan, ANC 3/4G Meeting, October 13, 2020, Erkin Ozberk, DC Office of Planning,” available at <https://bit.ly/360S4Xc>.

Chevy Chase Gateway will help promote the creation of more affordable and workforce housing in our neighborhood.

The Commission continues to have serious reservations, however, about some aspects of the proposed Comprehensive Plan changes. Since 2018, we have questioned the basis for the Office of Planning’s assumption that the District’s population would increase to almost one million by 2045.⁸ We continue to believe that such projections are not well founded, could be based on changing lifestyles that are being accelerated by the current public health emergency, and could create unrealistic expectations and planning assumptions, as described below.

The COVID-19 public health emergency casts doubt on many of the assumptions that underly the proposed Comprehensive Plan amendments. The pandemic may create permanent shifts in the places where people work, the kinds of services that they require, where people want to live, and how public spaces are used. It is impossible now to predict how those changes will impact the Comprehensive Plan. No matter what Comprehensive Plan changes the Council adopts, there is a strong probability that they will almost immediately be obsolete as the key assumptions morph.

Finally, and most importantly, despite our repeated criticism, the Comprehensive Plan amendments do not contain specific planning for the infrastructure that will be

⁸ “ANC 3/4G Testimony before the Committee of the Whole on the Comprehensive Plan Framework Amendment Act of 2018,” March 20, 2018, pages 2-3, available at <https://bit.ly/2MSuCD8>; “ANC3/4G Resolution Regarding the Comprehensive Plan Amendments Act of 2019 (B23-0001),” July 22, 2019, paragraphs 4 and 5, available at <https://bit.ly/2GkpIhS>.

necessary to support projected growth. The Commission advised the Office of Planning to “include a policy that addresses the need for infrastructure — e.g., transportation, parks and recreation, libraries, utilities, and schools — that accommodates projected population growth” and

to create a specific plan for where, when, and how the District will locate, build, and fund public schools for the children in the Wilson High School Feeder Pattern so that new development and population growth will not exacerbate current school overcrowding.”⁹

The Office of Planning’s only response was that our request for a specific plan was “beyond the scope of the Comprehensive Plan.”¹⁰ It is irresponsible to plan for significant population growth and to encourage significant new affordable housing without a commensurate emphasis on planning for critical infrastructure like schools and recreation space.

The Office of Planning’s proposed Comprehensive Plan amendments are incomplete in terms of overall community planning, opaque as to how amendment recommendations were solicited, analyzed and proposed, and may be based on seriously flawed assumptions. The only saving grace is that they will be replaced by the 2025 Comprehensive Plan rewrite. For this reason, we do not oppose the Council’s approval of Bill 23-736 based on representations that the Comprehensive Plan will be completely

⁹ “ANC 3/4G Resolution Requesting Changes to the Office of Planning’s Proposed Amendments to the Comprehensive Plan,” February 10, 2020, paragraph 16, available at <https://bit.ly/2Ir1Gzb>.

¹⁰ Letter from Andrew Trueblood to Advisory Neighborhood Commission 3/4G, re: Advisory Neighborhood Commission 3/4G Comprehensive Plan Resolution, April 23, 2020, page 7, available at <https://bit.ly/328HQTD>.

rewritten by 2025, when the Office of Planning will better understand the long-term impacts of population growth trends and COVID-19.