



**Government of the District of Columbia**  
**ADVISORY NEIGHBORHOOD COMMISSION 3/4G**

Chevy Chase, Barnaby Woods, Hawthorne  
5601 Connecticut Avenue N.W. P.O. Box 6252 Washington, D.C. 20015  
3G@anc.dc.gov <http://www.anc3g.org> YouTube: ANC3G Office: 202.363.5803

**COMMISSIONERS**

3/4G-01 - Lisa R. Gore, Vice Chair      3/4G-02 - John Higgins, Treasurer  
3/4G-03 - Randy Speck, Chair      3/4G-04 - Michael Zeldin      3/4G-05 - Connie K. N. Chang  
3/4G-06 - Peter Gosselin, Secretary      3/4G-07 - Charles Cadwell

---

ANC 3/4G Resolution  
Regarding the Draft Chevy Chase  
Small Area Plan  
May XX, 2022

- This resolution reflects the views of ANC 3/4G on the Office of Planning's draft Chevy Chase Small Area Plan (CCSAP). The Commission appreciates OP's efforts to conduct a planning process and prepare the draft, and its sharp focus on seeking opportunities for new affordable housing production and environmental imperatives. We are supportive of these goals and seek to balance them with additional values articulated by residents during the planning process deeply held by our community.
- To strike this balance and address other areas of concern, we believe the amendments and alterations set out in the Commission's resolution are necessary. Without these changes the Commission believes the draft plan will not achieve its objectives.
- It is the view of the Commission that the changes it proposes will round out a vision of the community's future that it articulated when it requested a small area planning process and will assure that there is an on-going community and ANC voice as details of that vision are further elaborated and implemented in the coming years.

- At its February 10, 2020 meeting, the Commission, as part of commenting on and requesting changes in OP’s then-recommended amendments to the District’s Comprehensive Plan, [called for](#) a “Small Area Plan for the Chevy Chase Gateway,” spelling out issues that the sought planning process should address to “help guide long-range development, improve our neighborhood, achieve city-wide goals, and attain economic and community benefits.”
- In the intervening two-plus years, the Commission followed up by, among other things, seeking funds with the help of Ward 3 Councilmember Mary Cheh to underwrite the planning process, asking for and [receiving briefings](#) from OP about the status of its request for such a plan, and devoting multiple publicly noticed meetings to discussion of the evolving plan. Since planning got underway in early 2021, the Commission has approved [no fewer than five resolutions](#) asking for improvements in the planning process, has [written](#) or met with OP officials, Council staff and others and has sponsored [a series of now nine information exchange sessions](#) on topics ranging from zoning to the lived experience of Chevy Chase neighbors. Commissioners also attended or participated in a host of plan-related sessions sponsored by OP or community groups.
- On March 14, 2022, OP issued a 63-page “Chevy Chase Draft Small Area Plan” (CCSAP) that describes aspects of the community, provides design guidelines for new development almost exclusively in the 10-acre commercial corridor and lists a series of recommendations that primarily focus on housing and environmental imperatives.
- In one form or another, the document is likely to become part of the District’s now-amended Comprehensive Plan, so it is incumbent on the Commission to comment on and request necessary changes in the same way it did for the Comprehensive Plan amendments. The integration of CCSAP into the Comprehensive Plan and subsequently into zoning regulations and other land use decisions will affect both current and future residents represented by this ANC, as well as the Commission’s future activities. Although the CCSAP targets only the commercial core of Chevy Chase, its provisions are of significant interest to residents across the ANC. As a consequence, this resolution addresses both our concerns about the current plan and about its implementation in the future, seeks both specific edits and inclusion of additional structural elements – e.g., creation of a new zoning district and development approval standards – as well as a process for implementing these elements that would assure on-going community engagement.
- The Commission begins by reiterating the [key elements it embraced](#) at the top of its 2020 resolution calling for a small area plan:

- "Our community **needs more affordable housing that will promote income diversity** and enrich our civic life;"
  - "Our neighborhood **can and should accommodate population growth** while also **preserving its hallmark livability** and assuring that new development has a **compatible scale, function, and character with the surrounding structures;**"
  - "Our residents **require increased infrastructure planning** - especially for public schools and transportation - that specifies how the District will meet demands for the current and future population." (Emphasis added.)
- To pursue these and related goals, the CCSAP requires the addition of two major elements: (1) a call for establishment of a new zoning district that the ANC and the community will have a role in drafting and (2) a new development review and project approval structure to be integrated into the new district or zone – as well as a variety of other changes detailed below and in Attachment 1 to this resolution. The Commission’s approval or positive assessment of the draft plan and its future success in achieving the plan’s ambitious goals depends on OP and the Council including the changes detailed in the body of this resolution and in Attachment 1. The Commission has additional questions and concerns that is lays out in Attachment 2, to moving forward on the plan’s major elements at this time.
  - With respect to the first major element, the Commission builds on a suggestion that OP makes in the last paragraph of the draft plan. It reads in part “To implement the CCSAP (Chevy Chase Small Area Plan) for matter-of-right projects, a new zone could be created that incorporates many of the building form and use-related guidelines (in the draft) as development standards...”
  - The CCSAP requires the specificity that a special zoning area or zone will provide. Such a special zoning area can be established either as an NC zone under the 2016 Zoning Code or, potentially, as an overlay district, a category which it is [led to believe](#) is being revived under Zoning Commission Case 18-16.
  - In order for the new zone to be successfully implemented, the CCSAP requires additional language specifying the following elements:
    - That all of the design guidelines beginning on [page 48 of the draft plan](#), as well as additional guidelines sought later in this resolution be considered mandatory development standards for any new project in the upper Connecticut Avenue commercial corridor until such time as drafters of the designation language for the new zone devise a form-based code for the zone, seek and receive ANC and community input and and win Zoning Commission approval for the code that will include many of these guidelines as well as others;

- That a committee that includes equal representation from OP, the ANC and the Chevy Chase community draft the new zone's designation language before a zoning change is presented to the Zoning Commission;
  - That this drafting committee has the right and obligation to examine issues and suggestions detailed in this resolution and in a final CCSAP, and to include language in the designation that addresses these;
  - That the ANC and a newly established ANC Zoning, Development and Design Standing Committee (ZDD) proposed below be part of the project review process for the new zone to ensure compliance with the interim mandatory development rules drawn from the draft CCSAP and later the form-based code as well as in any Planned Unit Developments and similar processes for larger project proposals; and
  - That, if it is proposed and supported by the community, consideration be given to designating the west side of Connecticut Ave from Livingston Street to Chevy Chase Circle a historic district.
- The second major element the Commission wants added to the plan seeks to embody the need for a balance between smart development that improves the lives of residents and business owners, invites greater racial and socio-economic diversity, and addresses environmental concerns, and limits that are clearly understood and enforced to protect the many positive attributes of the community in its current form.
  - The Commission recognizes that [Mayor Bowser](#), OP and advisers such as the [Urban Land Institute](#) in its 2019 report about the District planning area of which Chevy Chase is a part believe that smart development requires a streamlined project approval process. It is equally cognizant that many residents here and elsewhere in the city are concerned about untrammelled development that damages or destroys communities in the service of narrow ends.
  - In order to achieve the intended balance between these two sets of goals, the CCSAP needs to be modified to specify the following streamlined development review and project approval process and that this structure, as refined by the proposed drafting committee, be incorporated the new zone for the upper Connecticut Avenue corridor:
    - If proposed new structures are no more than **45 feet in height** including any penthouse or mechanical floor and strictly comply with a set of fixed standards – initially a mandatory version of the design guideline in the draft plan and additional guidelines sought below and later a form-based code devised by drafting committee for the new zone — those structures would require no further review beyond a continuing compliance check;
    - If proposed, new structures meet all of the above requirements and devote at least 30 percent of square footage to affordable units as defined by this Commission, those structures can be up to **60 feet** in

height inclusive of penthouse and mechanical floor with no further review process beyond compliance checks; and

- If proposed new structures **exceed 60 feet**, they must follow Planned Unit Development (PUD) rules and those that drafters include in the designation for the new zone apply with requirement for substantial ANC and community input.
- Neither the proposed new zone nor the provisions in any additional rules sought by the Commission in connection with the CCSAP be construed as precluding or in any way hampering consideration of an historic district for the west side of upper Connecticut Avenue or a larger area of the Chevy Chase community.
- To facilitate its participation in anticipated development issues and to build local expertise, the Commission establishes a Standing Committee on Zoning, Development and Design (ZDD). The Committee shall study and advise the Commission on all matters involving the built environment, transportation and parking both in the Connecticut Avenue commercial core and the full ANC community. The Commission shall assign three commissioners as regular members, who will propose for Commission approval the structure, procedures, and public membership for the panel.
- The Commission proceeds with its review of the draft CCSAP below under five headings – affordable housing, Community Center-Library/Civic Core, retail corridor, infrastructure and design. These are largely drawn from the Commission’s February 2020 resolution calling for a small area plan. The format under each is to look to the 2020 resolution and related Commission action for guidance and authority, followed by assessment of the draft plan, requests for amendments, alterations or explanation. Language changes, additions or deletions sought by the Commission are compiled in Attachment 1, which includes all of the draft CCSAP’s recommendations, design principles and design guidelines organized under the plan’s six themes. Questions and concerns are detailed in Attachment 2.

## **AFFORDABLE HOUSING**

- The need for, and pressure to produce, new affordable housing in this community are considerable and complex – a city where development has generated [hundreds of thousands](#) of new units over the last decade, but only [a few thousand new, affordable](#) ones; a price-driven exodus of longtime residents, many people of color, and a growing burden for many who remain; a mayor with an [ambitious housing agenda and special focus](#) on a section of the city that includes Chevy Chase, a [past of racial expulsion and exclusion](#) brought into new focus by local residents and a desire -- and ability -- to contribute to solving the difficult problem of housing for all.

- This Commission has consistently pressed for new affordable housing here, declaring in our February 2020 resolution that first sought a small area plan, “[o]ur community needs more affordable housing that will promote income diversity and enrich our civic life.”
- The Commission has asked that new affordable units, whether on a public site such as the Community Center-Library or in private projects along the upper Connecticut Avenue commercial corridor, make room for those in greatest need, seeking in a March 22, 2021 resolution to have affordable development here “focus on households earning 50% or less of median family income (MFI).” For a family of four in 2021, 50 percent of MFI was \$64,500.
- This Commission has asked that affordable units make up a substantially greater share of projects here than are required by the city’s standard tools for getting units included in new developments, Inclusionary Zoning (IZ) and Inclusionary Zoning Plus. In its March 2021 resolution, it asked that affordable units make up “at least 50 percent” of those at a redeveloped Community Center-Library and “at least 25 percent” in private developments in the commercial corridor. The city’s Inclusionary Zoning has generally required [8 to 12 percent](#). Its successor, Inclusionary Zoning Plus, requires [up to 20 percent](#).
- The Commission and its Comprehensive Plan Task Force have assessed IZ and IZ-Plus as means to achieve affordable housing production and concluded that “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.”
- The Commission and its Task Force have [recommended](#) as an alternative or supplement “partnerships that include non-profit developers who are not constrained by the same economics that control traditional, for-profit projects” and have been clear that projects in “high-cost neighborhoods like ours” will require subsidies in the form of city-owned property such as at the Community Center-Library and allocations from the District’s Housing Production Trust Fund.
- It has repeatedly asked that projects include larger units, for example, in its February 2020 resolution supporting “development of affordable and workforce housing that is suitable for families...”
- Finally, it has consistently and repeatedly sought a small area plan that paves the way for new affordable housing by, in the words of the ANC task force report included in its February 2020 resolution, recognizing “this neighborhood’s opportunities and limitations,” “stimulating partnerships and coalitions of developers – non-profit and for profit,” and “acknowledging the need for significant District participation through contributions of its own resources.”



- The Commission is heartened by the goal that the CCSAP sets for itself – to expand housing options in Chevy Chase “to accommodate a greater range of incomes, ages, and racial diversity to advance the District’s housing equity goals, support the commercial main street and enhance the social and economic well-being of the community.”
- It believes the planning process that OP has conducted and the draft it has produced lay out many of the reasons why the Chevy Chase should and must act to shoulder its fair share of what the Comprehensive Plan, of which the CCSAP will soon become a part, calls the “social responsibilities of the (District) community,” among them “accommodating the overall growth of new residents, housing the homeless, feeding the hungry, and accommodating the disabled.”
- It appreciates the recognition in the plan and by the Bowser administration of the limitations within which the community operates -- a 10-acre Connecticut Avenue core that has been focus of the planning process, made up mostly of small parcels that have been built out in their current form for a half century and are largely privately owned, with only one of two public sites, the Community Center-Library and the WMATA bus terminal, available for change. The plan notes on page 31 that only 10 percent of land along the Avenue and in immediately adjacent area is currently available to accommodate new housing. Mayor Bowser, in a fall 2021 progress report on her housing agenda, [assessed the area](#) as providing a “modest but important opportunity to realize equitable growth along a gateway corridor.”
- Given these limitations, the Commission believes that the draft plan needs to further sharpen its focus. To that end, it seeks three kinds of changes.
- To bear down on the most immediately attainable goal, redevelopment of the Community Center-Library site with affordable housing, and to strengthen its commitment to participation by the ANC and the community, the CCSAP requires the following:
  - That OP add to language in the call-out box on page 28 in these ways:
    - In the first paragraph, in the sentence that begins “Following adoption...”, add to the phrase “will be a collaborative effort of District agencies,” “**ANC 3/4G, its Standing Committee on Zoning, Development and Design (ZDD) and the Chevy Chase community;**”
    - In the second paragraph, under “1. Pre-RFP...”, add to the phrase “...will co-host a community meeting,” “**in partnership with ANC 3/4G.**” Add to the end of the sentence that begins “Agencies will share,” “**and invite community input.**”
    - In the fourth paragraph, under “3. Design...”, add after the phrase “ongoing coordination with...” add “**ANC 3/4G and**”

- That OP add the ANC and its to-be-formed Standing Committee on Zoning, Development and Design (ZDD) to the list of agencies in the “Implementors” column of the table on page 29;
- That OP add the following language in the table on page 29:
  - To Recommendation 3.1, add the initial phrase “With input from ANC 3/4G’s Standing Committee on Zoning, Development and Design,”
  - In Recommendation 3.2, after the phrase “household sizes,” add “with a focus on providing units for households earning 50% of MFI or below.”
  - To Recommendation 3.4, add the initial phrase “With input from ANC 3/4G’s Standing Committee on Zoning, Development and Design,”
  - To Recommendation 3.4, after the phrase “mixed-income housing,” add “with a focus on providing units for households earning 50% of MFI or below.”
  - To Recommendation 3.5, add the initial phrase “With input from ANC 3/4G’s Standing Committee on Zoning, Development and Design,”
- That OP add the following language in the table on page 33:
  - To Recommendation 4.1, add the initial phrase “With input from ANC 3/4G’s Standing Committee on Zoning, Development and Design,”
  - To Recommendation 4.1, after the phrase “dedicated affordable housing,” add “with a focus on providing units for households earning 50% of MFI or below.”
- The Commission recognizes that the draft plan makes mention of possible alternatives or supplements to IZ and IZ-Plus as means to pursue affordable housing production, for example community land trusts in Recommendation 4.3.
- To further pursue alternative or supplements to IZ and IZ-Plus, the CCSAP requires the addition of a new recommendation to charts on pages 25 and 33 that calls on the joint drafting committee for the proposed new zone to investigate methods to encourage use of partnerships that include non-profit developers who are not constrained by the same economics as traditional for-profit developers and may thus be more effective at delivering the kinds of smaller affordable housing projects that the largely small-parcel makeup of the upper Connecticut Avenue commercial core requires, and, if satisfied these methods are workable, to add to the designation for the new zone language that facilitates their use.
- While the Commission recognizes that a debate may be in the offing about more sweeping changes involving zoning, land use and homeownership that could affect the whole of Chevy Chase, these issues and whole of the community were



not the focus on the small area planning process that has just occurred. To keep the CCSAP properly targeted, it requires the following deletions:

- Recommendation 4.4 because it goes beyond the boundaries of the SAP study area;
- Recommendation 4.6 because it appears to overlap Recommendation 4.2 and reach beyond the boundaries of the SAP study area.
- Recommendation 4.7 because it reaches beyond the boundaries of the SAP study area.

## **COMMUNITY CENTER-LIBRARY/CIVIC CORE**

- The Community Center-Library site accounts for almost 20 percent of the 10-acre upper Connecticut Avenue commercial core. It is publicly owned. The two buildings are obsolete and need to be replaced. As such, it is, as the draft plan notes, likely to be the first and potentially trend-setting locus of change in the corridor's built environment. This is a welcome opportunity to model many aspects of the Small Area Plan, including design guidelines, community and ANC engagement, and integration of issues addressed in the several different sections of the draft CCSAP. Development of this space addresses a range of community goals and should be the center of on-going community attention with multiple constituencies of likely users. The timing of the project is likely to be the first visible product of the CCSAP where the ambitions we all have for inclusive engagement of the community in designing its future will be put to the test.
- The Commission has sought to reimagine and renovate or replace the Community Center since 2016. Among its efforts: [20 public hearings](#) between 2016 and 2018, a survey that attracted responses from almost 1,000 residents and a [155-page report and recommendations](#). It has a similar, although shorter, history with the Library.
- The Commission's thinking about the development of this site has evolved over time. In its February 2020 resolution seeking a small area plan, it asked that the planning process focus on "[e]nhancement of the space around the Chevy Chase Public Library and the Chevy Chase Community Center" and "Modernization of the Chevy Chase Public Library to include mixed-use/ colocation with affordable housing development," but made no similar mention of the Community Center. But by May 2020, commissioners were [testifying](#) before the Council on the need for a more ambitious project.
- The Commission has increasingly conceived of the project as an effort to re-make the entire site with one or more buildings to house the two public institutions and affordable housing. Most recently, it has held [a series of conversations](#) with the Mayor's office, Council, Department of Parks and

Recreation (DPR), which oversees the Community Center, and officials of the DC Public Library (DCPL) system about consolidating the capital budgets for DPR and DCPL in anticipation of an omnibus project.

- In a March 22, 2021 resolution, the Commission voted unanimously to advise OP to set a goal for mixed-income housing at the site “of at least 50% dedicated affordable housing” with this housing having “a focus on households earning 50% or less of median family income (MFI).”
- Given this background, the Commission welcomes the draft CCSAP’s focus on the Community Center-Library site, which it retitles the “Civic Core” and looks forward to working with the city to realize a project that serves a variety of purposes. At the same time, the Commission raises several concerns about the details of draft plan’s “Civic Core” chapter and related recommendations in hopes of smoothing the way for a successful project.
- As currently written, the recommendations chart on page 29 of the draft plan makes no mention of the ANC in the “Implementors” column. Given the central role of this space to the civic life of the community and in the CCSAP, and the ANC’s initiative in reimagining this site, it is essential that the Commission be added to the list and that it play a key role in the planning and execution of the project.
- At several points in the text, the draft plan notes the importance of the open space at the site and the need to preserve it. For example, on page 27, it says “Given the high utilization of the existing playground, basketball court and central courtyard, it will be important to include these recreational spaces into the new site and building design.” But the visual representations OP has presented during the planning process do not appear to provide adequate space and space that will be open to sun and air circulation. For example, see slide 6 of OP’s February 23, 2022 poster session [here](#). The CCSAP requires acknowledgement in the list on page 29 that any development on the site requires substantial open space for functions that are now served by the playground, basketball court, and central courtyard.
- The Commission has similar concerns about parking. Parking is crucial especially for older users of the Community Center and Library, as well as for users who live at a distance from Chevy Chase’s Connecticut Avenue core. The addition of housing at the site will generate the need for more parking. Existing surface parking for users of the library and community center, as well as the outdoor facilities, take up a substantial portion of the site. The visual representations presented by OP to date do not suggest where the needed parking might be located, coupled with Recommendation 2.4 on page 25 of the draft plan that calls for “minimizing surface parking,” this concerns the Commission.

- In order to address these concerns, Recommendation 2.4 requires modification to acknowledge the need for underground parking that will accommodate transportation needs that cannot be met through a robust development of multimodal alternatives to vehicles. New recommendations both on page 25 and in the Civic Core recommendations on page 29 are necessary to require an analysis to determine how much parking will be required at the Community Center-Library site, recognizing that this may require the development of underground or deck parking.
- Finally, the Commission addresses Recommendation 3.4, which reads in part “Submit proposal to rezone the site to leverage full Comprehensive Plan height and density . . . .”
- In its February 2020 resolution, the Commission sought a small area planning process in part to set the stage for “new developments of compatible scale, function, and character with the existing neighborhood.” The draft CCSAP recognizes that the Civic Core project is likely to be the first to occur and a pace setter, saying “this public investment in community development and housing equity has the potential to catalyze subsequent private investment in the Connecticut Avenue corridor.”
- Given the need for compatible scale and the likely pace-setting nature of the Civic Core project, the CCSAP requires amended language in Recommendation 3.4 to ensure the Community Center-Library project will conform to the height and development approval process called for earlier in this resolution. (See Attachment 1 for proposed language.)

## RETAIL CORRIDOR

- In its [February 12, 2020 resolution](#) seeking a small area planning process for the community, the Commission called on the Council to include a policy for the Chevy Chase Gateway or upper Connecticut Avenue commercial corridor such as:

“Support community-led planning for **enhanced retail** and housing strategies in the Chevy Chase Gateway that **will grow and strengthen the local businesses**, continue to attract and serve local residents with new developments of compatible scale, function, and character with the existing neighborhood, improve income diversity by expanding affordable and workforce housing and establish a distinctive entrance to the city.” (Emphasis added.)

- Further, the Commission called on the Council to amend the Comprehensive Plan to require a small area planning process for the Chevy Chase Gateway that included among other goals:
  - **“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 the commercial businesses and new residential development.”**
- Since the February 2020 resolution, the Commission has repeatedly expressed concern about the economic health of Connecticut Avenue businesses. It sought to help them cope with both the immediate crisis of the COVID pandemic and long-term changes in retail patterns by, among other things, pressing for creation of the Chevy Chase Main Street program, which provides small-business assistance grants, and, when initial funding was threatened, [calling on the Mayor, the Council and the Department of Small and Local Business Development \(DSLBD\) to restore the funds](#).
- Most recently, the Commission has sought to ameliorate the worst of the physical deterioration caused by recent business failures and storefront vacancies along the Avenue by [pressing owners of the former American City Diner](#) to comply with municipal billboard regulations and clean up their property or face tax penalties.
- The Commission recognizes that the draft small area plan does address the subject of the retail corridor. Indeed, it notes that the year-long planning process focused almost exclusively on the corridor. And the plan itself includes several provisions that address the Commission’s call for strategies that will “grow and strengthen local businesses,” especially small businesses.
- For example, in the “Design Guidelines” section, under 1.2 b. on page 50, it suggests that for larger developments and as part of any consolidation of commercial lots, retail storefront entrances should be spaced every 25 to 40 feet, which would have the effect of producing the kinds of smaller retail spaces that are more conducive to small stores and businesses.
- More generally, in recommendation 2.2 on page 25, the draft plan says that “redevelopment along Connecticut Avenue should reinforce a vibrant retail streetscape that maintains a pedestrian friendly sidewalk character and creates retail spaces scaled to attract independent, local businesses.” And it notes on page 47 that the west side of the Avenue “largely embodies commercial building and streetscape features that are valued by the community” and indicates that guidelines for future development should “encourage the preservation and

incorporation of special qualities of existing signature buildings that create a unique and memorable sense of place.”

- Overall, however, the Commission believes the draft plan’s assessment of the retail corridor on pages 34 through 37 understates the dimensions of the challenges that corridor businesses face and so does not offer as robust a set of recommendations as needed
- In part, this may be as a result of an overly sanguine analysis of current conditions. For example, under “By the Numbers” on page 35, the draft says the retail corridor had a low 2-percent vacancy rate during the first quarter of 2021. But a comprehensive [retail market analysis](#) of the upper Connecticut Avenue corridor performed for Chevy Chase Main Street published in June 2021 found an overall vacancy rate of 4 percent and a storefront vacancy rate of 18 percent.
- Similarly, addressing the impact of COVID, the draft says “The high household incomes in Chevy Chase, paired with employment in sectors that mandated and encouraged working from home, likely resulted in higher neighborhood expenditures along the corridor since 2020.” The Stover Study [concluded](#) that expected retail sales dropped six percent between February 2020 and May 2021
- More broadly, both for retail and for several other key issues the Commission asked in its February 2020 resolution that the small area plan address, the matter may be one of focus and balance. The draft forthrightly state on page 6 that the key goals of the city’s Comprehensive Plan and the Chevy Chase Small Area Plan that will become a part of it is to “encourage more housing production within (the Connecticut Avenue) commercial corridor” and secondarily to pursue environmental goals at least in part by discouraging vehicle use and its attendant pollution.
- While the Commission shares all of these goals, it has made clear from its first call for a small area planning process that it will seek to balance their pursuit with a range of related goals highly valued by the community, among them, ensuring the recovery of the community’s retail district and the addition of a new vibrancy to it.
- To this end, the CCSAP requires amendments to the retail corridor provisions of the draft plan that emphasize the following additional goals and that drafters of the special zoning area or zone seek to include requirements or strong incentives for pursuit of them in any new development in upper Connecticut Avenue commercial core:
  - For current operation of the retail district, the city substantially increase funding and potential grant amounts for facilities’ enhancement and technical assistance to individual businesses through the Chevy Chase

Main Street program or the Department of Small and Local Business Development;;

- For current operation of the district, convene city agencies and owners of existing restricted parking lots to negotiate the opening of those lots for corridor-wide use in return for the city providing new, highly visible and consistent signage to direct vehicles to lots and investigating with developers and businesses the installation of use-maximizing methods such as occupancy monitoring systems linked to an app provided residents when they apply for their driver's license or vehicle registrations or renewals to direct them to open spaces;
  - For new development, as part of the rules for the new zone, developers be required to work with existing commercial lessee/tenants to prepare business continuity plans for the construction phase such as are mentioned in Recommendation 5.3 on page 37 of the draft plan, a right of first refusal for current lessee to return to locations vacated during construction and a formula for developer contributions to help businesses both leave and return to sites;
  - To boost new development on commercial sites such as the Safeway property now shut in by complex ownership or passive owners, the city consider deep, but temporary (one or two years) capital gain tax holidays to encourage deal making and sale;
  - To maximize available space, as part of rules for the new zone, developers and the city jointly finance construction of underground parking. Such financing also might involve lessee/tenants in the case of larger projects. At minimum, underground parking should replace existing surface lot and street parking removed as a result of development. Parking capacity beyond this minimum should be added if need can be shown; and
  - To maximize available space, as part of drafting the new zone or in another forum, examine the bus turnaround for possible municipal or developer purchase from WMATA and development.
- The CCSAP requires language instructing the drafters of the new zone to canvas experts in zoning and development for other or additional methods that can be written into the zoning designation to pursue the goal that the Commission enunciated in its February 2020 resolution of the "retention of neighborhood-serving retail with particular emphasis on locally owned and operated small ('mom-and-pop') businesses."

## **INFRASTRUCTURE**

- The Commission is aware and appreciates that concerns about overburdening existing infrastructure can be used as a convenient excuse for opposing any change. But for an inner-ring neighborhood that has grown rapidly, the fact that



residents are using the community's schools, roads and parking facilities near their limit is a daily experience.

- As a result, in its February 2020 resolution seeking a small area plan, the Commission emphasized the need to provide an agenda for improving infrastructure in tandem with a roadmap for change. For example, in assessing OP proposals to amend the city's Comprehensive Plan, the Commission concluded "[i]t would be imprudent to proceed with the [Comprehensive] Plan's growth scenario while neglecting to address the hard questions about public schools and other necessary infrastructure."
- Among the Commission's requests in that resolution was the Comprehensive Plan to require, and the small area plan for Chevy Chase to include:
  - "...[A] **specific plan for where, when, and how the District will locate, build, and fund public schools...**" that serve the community;
  - **Consideration** of "current proposals that would eliminate some bus routes...and change the layout of Connecticut Avenue," both of which it indicated could negatively affect the community's ability to handle new development and population growth; and
  - **"Parking (including potentially underground) to support the commercial businesses and new residential development."** (Emphasis added)
- The draft plan recognizes all three of these issues:
  - Concerning schools, it notes on page 20 that "During the 2019-2020 school year, Lafayette Elementary School was identified as operating at a 120% utilization rate (second highest among all DCPS facilities), Alice Deal Middle School at 93%, and Woodrow Wilson High School (voted by Council in 2021 to be renamed Jackson-Reed High School) at 102%;"
  - About traffic, it says on page 38 that "Automobile use is the predominant transportation option, with high-traffic Connecticut Avenue serving as both a major conduit and physical barrier;" and
  - With regard to parking, it says on page 39 that parking is a perennial issue of concern for businesses, mindful of both employee and customer needs."
- But having recognized the problems, the plan in its current form does not adequately address them and, in some cases, offers recommendations that would appear to make them worse.
  - Concerning schools, it notes on page 20 DCPS' purchase of two new facilities in 2021 that turn out to be a great distance from Chevy Chase and therefore would only very indirectly address overcrowding here. It urges in Recommendation 1.4 on page 21, the use of development and

growth forecasts “to inform decisions about how local public school capacity can keep pace with a growth family population,” but does not specify how problems in the Wilson/Jackson-Reed feeder pattern that serves this community will be handled.

- With regard to traffic and Commission concerns about elimination of bus routes and reconfiguration of Connecticut Avenue to replace parking and vehicle travel lanes with protected bike lanes, the draft plan notes on page 39 that bus ridership is down without exploring why, advocates possible extension of protected bike lanes beyond Legation Street to the Chevy Chase Circle, and studying the possibility of adding bike lanes between Connecticut and Wisconsin Avenues.
- With regard to parking, it advocates in Recommendation 2.4 “minimizing surface parking” on page 25 and then in Recommendation 6.3 on page 41 better coordinating use of existing parking without explaining how these recommendations square or whether surface parking will be replaced with underground parking.
- 
- The Commission believes that all of these issues need to be addressed as part of the development process and seeks and expects language changes and additions to the draft plan that it describes in Attachment 1 to ensure mechanisms are put in place to address them in tandem with new building and growth. Among other things, these ask:
  - That drafters of the new zone explore ways to encourage ongoing ANC-OP-DCPS assessment of school capacity needs to run parallel with the development process and, as above, to study how the means to finance new underground or deck parking might be built into the development rules for the zone; and
  - The DC Department of Transportation (DDOT) to further assess the effects of the currently favored Concept C for the Connecticut Avenue redesign on traffic diversion to side streets, on-time bus performance with fewer vehicle travel lanes, the removal of parking on adjacent businesses and parking on side streets, and how bicyclists and scooter traffic emerging from protected lanes will interact with cars, trucks, pedestrians, and businesses.
- At least in the case of traffic and parking, it appears that limited addressing of these issues in the draft CCSAP stems from a desire to discourage motor vehicle use and encourage more environmentally sound transportation options. The draft’s “Safe and Sustainable Mobility” chapter is largely devoted to proposing physical incentives for bike and scooter use and disincentives for motor vehicles other than EVs.
- The Commission supports the environmental goal of reduced motor vehicle use, but believes there needs to be a transition period that allows for, rather than forces, the move to cleaner mobility options. Existing transportation

infrastructure leave residents of the surrounding community, particularly seniors, dependent on automobile use. Eliminating parking in advance of other options being available, will strand residents and worsen already parking-limited levels of commerce. Scooter and bicycles may never be an option for some. The decline of bus ridership can be reversed by more and better service, not the elimination of key bus routes. The CCSAP requires a recommendation (laid out in Attachment 1) that acknowledges the need to accommodate a transition to reduced dependence on motor vehicles.

## **DESIGN**

- This Commission has sought ways to strike a balance between smart development that can improve the lives of residents and businesses, make room for greater racial and socio-economic diversity and address environmental concerns, and limits that protect the current community's many positive attributes. In its February 2020 resolution, it repeatedly returned to the phrase ["compatible scale, function, and character with the existing neighborhood"](#) as a primary requirement of any new development in the upper Connecticut Avenue commercial core.
- The Commission believes that the three most effective tools for striking and maintaining the balance between development and preservation are the height limits it advocates earlier in the resolution be included in the CCSAP and written into a new zoning area for the commercial corridor; deep and continuing involvement of the ANC and residents in writing rules for the new and approving larger protect, also advocated above, and strict and comprehensive design rules.
- The Commission appreciates the design principles and guidelines OP has included in the draft plan beginning on page 43 and sees them as a good starting point for crafting rules to govern new development in the community's Connecticut Avenue commercial core. It believe they should be strengthened as follows:
  - The CCSAP requires a specification that all of the design guidelines on pages 48 through 57 of the draft plan be included as development standards for the new zone area or zone sought above;
  - The CCSAP requires a specification that the joint OP-ANC-resident committee drafting the designation for the new zone modify the guidelines' language to make them mandatory requirements for all new development for a transition period until the committee has drafted, publicly vetted and presented to the Zoning Commission a form-based code that sets more extensive and varied development rules;
  - So, for example, Guideline 1.1a. which now reads "Ground floor commercial uses fronting onto Connecticut Avenue are strongly

encouraged and should take full advantage of allowances for show window projections to create strong visual connections between the sidewalk and interior spaces,” will be changed to “Ground floor commercial uses fronting onto Connecticut Avenue shall fully use allowances for show window projections...” or something the drafters consider equivalent.

- Or again, Guideline 1.3b. which now reads “Expansions and additions should incorporate architectural details that are consistent or complementary to those of the existing structures, preserving unique and well-built design features to the extent feasible,” will be changed to “Expansions and additions shall incorporate architectural details that are consistent or complementary to those of the existing structures, preserving unique design features” or again something the drafters consider equivalent.
- The Commission recognizes that some guidelines, for example Guideline 1.3a. that seeks to provide variety in buildings by breaking up large façades, may not translate easily into a categorical requirement. But the CCSAP requires direction to the drafters of the new zone designation to make all guidelines mandatory for an interim period until a form-based code that provides a menu of options can be devised and approved with ANC and community input. The interim mandate should not fall on many developers or heavily since, as the draft plan says, “physical change (in the upper Connecticut Avenue corridor) is not expected to be swift or widespread.”
- In addition to strengthening the design guidelines by making them mandatory, the CCSAP requires direction to the zone drafters to supplement the guidelines with more detailed requirements in several areas. It provides specific provisions below, but offers as an alternative that the drafters survey planning and design experts to refine the specifications included here while not making them any less stringent.
  - Front Step-backs: When, during the final months of the planning process, OP began providing visual representations of what the community’s Connecticut Avenue commercial core might look like in the future, a substantial number of residents expressed concern about it becoming too closed in by multi-story buildings and losing a small-town feel.
  - To address this concern during the interim before a form-based code is devised and approved with ANC and community input, the CCSAP requires a provision that the new zone require all floors above the second floor step back at least five feet and that, if there are floors above the fourth floor, it or they step back an additional five feet.
  - Back Step-backs and Buffer Widths: The Commission believes that it is crucial that new, larger and higher-density buildings or additions along Connecticut Avenue provide what the draft plan calls “appropriate transitioning or buffering” as they arrive back in adjacent older, smaller,

low-density adjacent resident areas. It appreciates that OP has recognized this need in Guidelines 1.4 a. and b. page 52 of the draft plan and the illustrative renderings on page 53. But it believes that what is required for the transition need to be specified until a form-based code that builds on these requirements is devised and approved with ANC and community input.

- The CCSAP requires a provision that the new zone require all new buildings and additions along the upper Connecticut Avenue commercial corridor above three floors step back as they arrive in immediately adjacent residential areas so that the final portion of the building has a height no higher than the roofline of the nearest residential structure and that the buffer area between the back facade of the Connecticut Avenue-facing structure and the facing façade of the nearest residential structure be at least 32 feet, whether public or public and private property.
- Alleys: The Commission recognizes that the draft plan assigns a substantial work to alleys, saying in Guideline 1.1e. that “All loading and parking should be accessed from existing alleys at the rear of the lot...” Given their importance, it believes the plan should include some basic minimum design standards and require that alleys be installed where none exist today.
- The CCSAP requires a specific direction that alleys serving Connecticut Avenue-facing commercial or public facilities to have a minimum width of 16 feet, include an additional 8 feet in width in loading areas to accommodate delivery trucks and whatever extra footage is needed to house dumpsters and permit trash trucks to access them.
- Trees: The Commission in its February 2020 resolution called for the small area plan that encouraged “attractive streetscapes” with, among other things, “street trees.” The ANC’s Comprehensive Plan Task Force, whose work underpinned the resolution, found in a survey that attracted 682 respondents that a “healthy natural environment with street trees and greenery” ranked in importance just behind quality public services, easy shopping, safe public places and good transportation. The draft plan talks extensively about both the need to address environmental challenges and the importance of “placemaking” and “identity.” But it mentions trees in a guideline only once and then in passing.
- The tree canopy appears to be one of the key placemaking characteristics of both the District and Chevy Chase and serves a variety of positive environmental ends, including tempering energy-inefficient air-conditioning use. And as the draft plan notes in illustrations such as those on page 53, can serve as an important buffer between large building along the Avenue and their smaller backyard neighbors.
- The CCSAP requires language directing drafters of the new zoning designation to consider including requirements to expand tree cover as part of the development process in order to provide buffering, improve the Connecticut Avenue streetscape, engage in placemaking and, in the

process, build a bridge to residents concerned about the community losing a distinctive and positive attribute.

## **CONCLUSION**

- The elected members of ANC3/4G look forward to positive change in Chevy Chase DC and, in asking two years ago for the development of a Small Area Plan, emphasized the need to increase diversity, promote and accommodate growth, while balancing the livability of Chevy Chase DC that is characterized by its scale, function and character. The amenities that have drawn people to Chevy Chase for decades need to be open to greater economic and racial diversity. A Small Area Plan alone does not accomplish these goals. As expressed in the reports and our resolutions related to our 2019-20 Comprehensive Plan and Racism Task Forces, our motivation in submitting these comments now is to take concrete steps to shape our more inclusive future.
- We appreciate that the CCSAP is one part of a longer journey – an important one – but still only part of a longer-term project toward making the Connecticut Avenue corridor (Gateway, Civic Core, Western Frontage, and Eastern Frontage) more equitable, environmentally sustainable, and vibrant for us and the next generation of residents. To that end, we will soon establish a Standing Committee on Zoning, Design and Development of this ANC to work with OP on a new zoning overlay to govern land use and urban design guidelines according to the wishes we expressed in this resolution. To reach the aims of the CCSAP will require an extended level of community engagement on the issues covered within the plan, enhanced steps by the city to communicate with citizens as the details of change are specified and adopted, and OP’s coordination with other city agencies with a role in shaping our community’s future. Our Standing Committee is our commitment to helping guide change, maintain community engagement, and work closely with District agencies who are tasked to implement these ideas.
- The recommendations detailed in this resolution and its Appendices rest on an extended period of study and community conversation led by this ANC – lengthy task force reports and numerous formal and informal conversations with our neighbors. Not everyone is in favor of having an SAP or perhaps of having this one. Our advice contained in this submission reflects the extended and in-depth engagement of the members of the ANC, the wide and detailed input from residents of Chevy Chase, as well as experts who have contributed to our nine recent Information Exchange Sessions carried out from Fall 2021 to Spring 2022. We have worked with the Office of Planning and have been both supportive and critical at various times.



- Our advice reflects our considered judgment about how best to successfully implement change in this vibrant community while maintaining its essential livability and character. We urge your attention to the specifics of this resolution and the Appendices that follow.

**APPROVED** at a regular public meeting notice of which was properly given, and at which a quorum of X (X) of seven (7) members was present on May XX, 2022, by a vote of **X** (Yes), **X** (No), **X** (Abstentions).

---

Randy Speck, Chair

---

Peter Gosselin, Secretary