

District of Columbia Office of Planning



Office of the Director

June 3, 2022

Advisory Neighborhood Commission 3/4G
Northwest Station
PO Box 6252
Washington DC 20015

RE: Advisory Neighborhood Commission 3/4G Resolution on the Office of Planning's Draft
Chevy Chase Small Area Plan

Dear Advisory Neighborhood Commissioners Speck, Gore, Higgins, Gosselin, Zeldin, Chang, and
Cadwell:

Thank you for your engagement in the development of the Chevy Chase Small Area Plan
(CCSAP).

On June 2, 2022, the Mayor transmitted the Chevy Chase Small Area Plan (CCSAP) for Council
approval. The transmittal includes the following (attached):

- Final CCSAP
- A transcript of the public hearing held on April 26, 2022
- All written comments submitted during the public comment period which ran from
March 14, 2022, through May 13, 2022

This letter provides additional context regarding how OP considered the feedback contained
in the May 9, 2022, Resolution on the CCSAP (with attention to section 7). Note that page
numbers in the comments reference the page numbers of the Final CCSAP.

Thank you again for your continued engagement and leadership. The Office of Planning looks
forward to continuing to work together to achieve our shared vision for Chevy Chase.

Sincerely,

A handwritten signature in black ink that reads "Anita Cozart".

Anita Cozart
Interim Director



ANC Resolution Text	OP Comment
<p>7.1 It is essential that the CCSAP require creation of a new zone and form-based codes that will apply to all future development (as mentioned on page 59 of the CCSAP). Those standards must include, among other things, specifications for height, setbacks, buffers with nearby residents, alley accessibility, and design features. This is the only way to ensure that new structures will meet the community’s expectations for balanced development.</p>	<p>Language has been revised on pages 61-62 of the CCSAP to specify that OP will draft a new zone to incorporate guidelines related to the building form, massing, and streetscape considerations identified in the Design Guidelines. Other guidelines outside the purview of zoning would be considered as part of public space review or the review of Planned Unit Developments. Also, to provide clarity, Recommendation 2.1 on page 27 was split into two recommendations to specify that a new zone should be created to incorporate form-based provisions described in the Design Guidelines:</p> <p>“Recommendation 2.1: Create a new zone along Connecticut Avenue, between Livingston and Western Avenues that incorporates the CCSAP Urban Design, specifically those that address building form.”</p> <p>“Recommendation 2.2: Planned Unit Developments should incorporate the CCSAP Urban Design Guidelines to the extent feasible.”</p>
<p>7.2 The CCSAP requires language specifying that during the period before a new zone or form-based code is developed, the design guidelines in the CCSAP serve as a benchmark or floor for any decisions that may come before the Zoning Commission.</p>	<p>The role of an approved Small Area Plan in the Zoning Commission’s deliberations is defined under current District law. When the Zoning Commission considers proposed new zoning and/or planned unit developments within the CCSAP, its decisions will be guided by the Comprehensive Plan and the approved CCSAP, inclusive of the design guidelines in the SAP.</p>
<p>7.3 It is equally essential that the ANC and the community (particularly those residents who live closest to the commercial strip) be integrally involved in</p>	<p>The role of the ANC in Zoning Commission cases is defined in DC Code Section 1-309.10(c)(1)(A)(iii) and is summarized on pages 59 and 60 of the</p>

<p>the creation of the new zone and form-based codes. We will, of course, solicit the views of zoning and design experts and the District’s experience with other special zones, but residents have a large stake in how the CCSAP is implemented, and as their representative we ask and expect to have a seat at the table on any steering committee or other mechanism as the detailed standards are developed and before they are presented to the Zoning Commission. The Commission’s proposal to create a Standing Committee anticipates the public engagement elements of the CCSAP with authority to participate in zone drafting activities similar to other projects within the District, such as St. Elizabeths (CCSAP, pp. 7 and 59; Brookings report, <i>Redeveloping the St. Elizabeth’s Hospital Campus: Opportunity and Complexity on a Hill</i>, Brookings Institution, September 2003).</p>	<p>CCSAP. The ANC’s proposal for a standing ANC Committee on land use and zoning would be in alignment with that role.</p>
<p>7.4 The CCSAP requires specificity for affordable and workforce (hereinafter affordable) housing goals. The Commission continues to support its March 22, 2021 resolution to include mixed-income housing in the Civic Core with a goal of at least 50% dedicated affordable housing and for the remaining Plan area a “goal of at least 25% affordable housing, with a focus on households earning 50% or less of MFI, considering other requirements as well.” The Commission also strongly supports Recommendation 4.3 and a commitment to develop “options for providing deeper affordability for rental and <i>homeownership</i>, such as vouchers and <i>community land trusts</i>” (emphasis added), as well as exploration of opportunities for not-for-profit developers to provide more affordable housing (CCSAP pp. 32-33).</p>	<p>The Comprehensive Plan includes essential guidance (see Implementation Section 2503.3) consistent with recommendations of the ANC to advance production of housing units as affordable to very-low- and extremely-low-income households in areas like Chevy Chase, with high housing costs and few affordable housing options.</p> <p>CCSAP recommendations on page 35 identify a range of tools to provide flexibility in achieving housing goals. For the District-owned property, District law requires public property dispositions include a minimum of 20-30% affordable housing. A breakdown of median family income (MFI) levels will be assessed during the RFP process for the Civic Core site. All property rezoned in accordance with the CCSAP would be subject to IZ Plus, which requires up to 20% of the</p>

	<p>building’s residential square footage be dedicated to affordable units. Any property redeveloping as a Planned Unit Development would include discussions with the community regarding an appropriate level and types of affordable housing being proffered.</p>
<p>7.5 The CCSAP must address more specifically how infrastructure — schools, transportation, parking, water, sewer, etc. — will be planned concurrently with any new development on the Connecticut Avenue corridor. As the Commission emphasized in its 2020 Resolution, whatever growth may occur in the Chevy Chase planning area cannot happen without accompanying infrastructure, and there must be a plan to make that happen.</p>	<p>In the District, there are development coordination and site-specific inter-agency review processes for physical infrastructure improvements and transportation demand management, triggered in advance of permitting, based on size of development, types of land uses, and number of new person trips generated by the project, etc. Off-street parking is regulated by the District’s zoning code.</p> <p>Additionally, long-range population and employment forecasts developed by the Office of Planning incorporate Comprehensive Plan Future Land Use Map designations in support of local and regional planning efforts. The forecasts are shared with District agencies to inform their capital and operational plans to ensure public facilities and services are responsive to anticipated demographic changes. The District's Comprehensive Plan includes essential policies (including IN-6.1.1 and IM-1.1.3, among others) that will guide coordination of infrastructure and redevelopment during the implementation of the CCSAP.</p>
<p>7.6 The CCSAP should not include topics that are outside the scope of this planning effort. In particular, Recommendations 4.4 and 4.7 of the draft CCSAP should be stricken. Though they may be considered in another forum at another time, they do not belong in the CCSAP, and the Commission does not support their inclusion.</p>	<p>Recommendation 4.4 regarding conversion of naturally occurring affordable housing to dedicated affordable units is an existing program that the Department on Housing and Community Development (DHCD) oversees. It considered as a tool in achieving dedicated housing affordability</p>

	<p>for District residents and meeting the housing goals for Rock Creek West.</p> <p>Recommendation 4.7 regarding the land value associated with low-density housing in the CCSAP has been deleted, in the narrative on page 34 further articulating that exploring this opportunity was not a part of the CCSAP. This topic was nevertheless raised by community members throughout the process.</p>
<p>7.7 The Commission specifically notes Recommendation 2.6, which “support[s] community efforts for historic landmark and historic designation of eligible resources within the Connecticut Avenue commercial corridor,” which encompasses the possible designation of the west side of Connecticut Avenue as a historic district. The Commission emphasizes that nothing in the CCSAP should preclude consideration of a historic district for the west side of Connecticut Avenue.</p>	<p>There is no language in the final CCSAP that precludes consideration of a historic district for the west side of Connecticut Avenue.</p>