

Comments on Draft Upper Wisconsin Avenue Corridor Small Area Plan

Friendship Neighborhood Association

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Introduction: Friendship Neighborhood Association

- We welcome development and improvements along Upper Wisconsin Avenue in Friendship Heights.
- However, that development must be in keeping with the already generous zoning limits and must be done in a way that improves, rather than detracts from, the lives of existing residents.
- Our primary concerns are with ensuring that the infrastructure is in place to support each development.
- Specific issues include:
 - Maintaining acceptable levels of congestion on our already overcrowded thoroughfares and residential streets.
 - Insuring that development does not overwhelm already inadequate fire, rescue and emergency services systems and/or hinder emergency evacuation.
 - Maintaining adequate parking for residents and their guests.
 - Deterring excessive development that will lead to overcrowding of our schools (e.g., Janney Elementary School).
 - Creating and maintaining green space, parks and playgrounds for our children.
 - Keeping truck traffic off residential streets.
 - Preventing unacceptable levels of noise and air pollution.

Current Zoning for Friendship Heights: The Product of a Careful Study of How Much Development the Friendship Heights Area Could Support

- The National Capital Planning Commission-D.C. Government Interagency Task Force that developed the current zoning limits.
- The traffic capacity of the area arterial and feeder streets formed the basis for the total amount of development that could be supported.
- Higher densities were allocated near the FH Metro station.
- Zoning categories encouraged the development of residential buildings, by allowing higher residential than commercial densities.
- The Ward 3 Comprehensive Plan names three sites for development of housing in Friendship Heights:
 - Lord & Taylor, Metro and the 5300 block of 43rd Street [subsequently developed as townhouses, the Courts of Chevy Chase]
- A significant amount of housing can be developed at these sites and others within the existing zoning.

Current Zoning Was the Result of a Well-Designed Planning Process: It Embodies True “Smart Growth” Principles.

- **Zoning Commission Order 87: Statement of Reasons:**
- “The rezoning carries out the following objectives:
 - protection of stable residential areas adjacent to the plan boundaries by concentrating intensive commercial development at the intersection of Western and Wisconsin Avenues where there will be immediate access to the Friendship Heights Metro Station;
 - controlling commercial and residential development within the plan area at a level consistent with the traffic capacity of the main arterial and feeder streets within the plan area;
 - rezoning certain property south of the intersection of Wisconsin and Western Avenues to a mixture of commercial and residential to encourage the development of apartments as well as neighborhood commercial facilities;
 - rezoning certain areas on the periphery of the plan area to medium density residential in order to provide a buffer between the high density commercial and mixed use portions of the plan area and the surrounding low density residential community.” *Emphasis added.*

•The development computations and zoning limits of current zoning are based on traffic considerations, which “threaten the stability of the adjacent single family residential communities.” [Statement of Reasons, p. 2]

•In calculating the zoning limits, the ZC assumed the availability of the Friendship Heights Metro Station and the construction of the "Ring Road" [not implemented].

Current Zoning was Based on the Development that Could be Supported by the Capacity of the Area Streets
The Area Cannot Support an Increase in the Zoning Limits and Probably Cannot Support Development Currently Allowed.

- The NCPC-DC Task Force designated zoning limits which use all available capacity if each of the sites was developed to the maximum allowed as a matter of right.
- Subsequently, several sites were developed, or have been approved for development, as Planned Unit Developments, with a significantly higher density and traffic impact:
 - Chevy Chase Pavilion: a retail shopping mall, an office building and the Embassy Suites Hotel;
 - Chevy Chase Plaza: street level and below grade retail, e.g. Roche Bobois, and office building and several condominiums; and
 - The Washington Clinic PUD [Stonebridge]: 125 condominiums and a 44-child day care center.
- Several sites in Montgomery County have been or will be developed with a significantly higher density and traffic impact than anticipated by the NCPC-DC Task Force.
- The “Ring Road” was never completed.
- ***If any change is to be made in current zoning, it should involve downzoning since development to the maximum allowed by current zoning level cannot be supported by the infrastructure.***
 - A Zoning Overlay similar to the Overlays in Dupont Circle, Foggy Bottom, Naval Observatory Precinct, Cleveland Park, Woodley Park, and Macomb/Wisconsin might be considered.

OP Planning Process Is Cart Before Horse Approach

- No analysis performed of the **Capacity of Existing Affected Infrastructure and Services** Prior to Recommendation Development. Affected Infrastructure and Services Include:
 - schools
 - roadways & parking
 - fire, rescue, safety and emergency services
 - public transit
 - environmental conditions such as air and noise quality
- No analysis performed of the **Effect of plan recommendations** on existing capacities and utilization.
- No analysis performed of **Options and costs** to DC and residents to mitigate effect of overdevelopment recommendations on existing capacities.
- A Redevelopment Plan for Wisconsin Avenue is not desired by community.

FH Transportation Study Does Not Support OP Plan

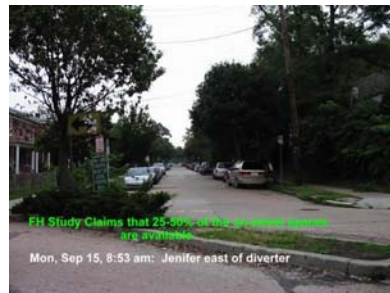
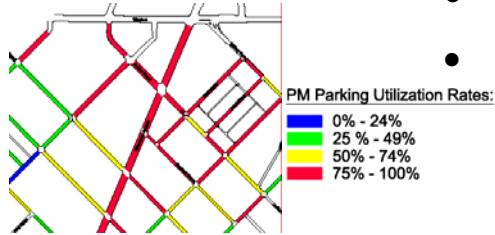
- **FH Transportation Study Does Not Address OP Plan Recommendations:**
 - Just 3 future developments in Friendship Heights included in study: Washington Clinic, Buick Dealership, WMATA.
 - No parking analysis performed
 - Millions of square feet of development recommended by OP not considered by FH transportation study
- **Other Issues:**
 - Study focus limited: parking studies excluded from scope.
 - Study area limited: Western Avenue/River Road intersection, area west of 45th Street, etc. outside study area
 - Traffic generation rates required by Montgomery County to evaluate future development in Friendship Heights, MD CBD are significantly higher [often double] than those used by DDOT for Friendship Heights, DC and the FH, MD-Central Business District.
 - The Montgomery County Planning Board trip generation rate for the FH Metro Station not adopted by DDOT.
- **Quotes From FH Transportation Study:**
 - “Study never intended as a referendum on development in the area, nor did the scope include detailed site analysis.”
 - “Parking is not adequate for the area, especially near the Wisconsin Avenue business community.”

The OP Proposal is Bad Policy: It is Bad for the District and Bad for the Residents of Ward 3

- The OP Proposal, if implemented, will deter needed development in other parts of the District:
 - It will direct development of multidwelling units to Friendship Heights and Tenleytown.
 - This results in depopulation of existing apartment buildings in other neighborhoods, harm to small businesses and destabilizes those neighborhoods.
 - This also makes development of residential buildings in other neighborhoods more risky, since it reduces the demand for those units.
 - It does not produce extra tax revenue, since the addition of units here will be at the expense of development of new or rental of existing units of other areas.
- The OP Proposal will reduce the quality of life in the surrounding low-density Friendship Heights residential neighborhoods:
 - As shown below, there will be excessive increases in traffic.
 - There will be excessive increases in the utilization of on-street parking, meaning that homeowners will be unable to find spaces within blocks of their homes
 - These neighborhoods are an important and unique asset for the District: Providing a neighborhood where homeowners can have modest houses on small lots near the Metro.
 - The OP proposal degrades and destabilizes the neighborhood, and merely replicates high-rise apartment neighborhoods.
- Alice Rivlin discusses the value of targeting development. Neither Tenleytown nor Friendship Heights are on her list of twelve neighborhoods to be targeted:
 - Bellevue, Columbia Heights, Congress Heights, Pennsylvania Avenue SE, Georgia Avenue/Petworth, Historic Anacostia, Ivy City/Trinidad, Minnesota/Benning, H Street, Near Southeast, Shaw, Takoma [Revitalizing Washington's Neighborhoods, April 2003]

OP's Plan Will Overwhelm On-Street Parking Supply

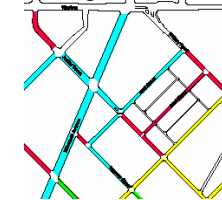
FHTS: Weekday
Parking Utilization



- OP Plan: Even if
- Developers provide one off-street space for each unit, twice that required with current zoning, and 3-4 times that required with upzoning,
- Lord & Taylor is developed at half the maximum density in the OP Plan,
- New residents of developments north of Harrison Street will own 3,800 private vehicles



FHTS: Weekend
Parking Utilization



Note: Baby Blue is more than 100% utilization

Of those, at least 1,100 will be parked on the street.

These cars will, for example, more than fill the parking lot for the Chevy Chase Center (Giant and Clyde's) AND the parking lot for Saks Fifth Avenue combined.



On-Street Parking is a Major Concern Even With Current Zoning

- Development will consume all available on-street spaces unless on-street parking utilization is controlled, by requiring parking validation for 2-3 hours for retail development and by requiring parking agreements for residential PUDs.
- For Harrison to Western Avenue, development allowed as matter of right with current zoning can add 1,300 vehicles to the neighborhood, of which **375 private vehicles will rely on-street parking** if developers provide one space per unit on-site.

This is approximately the capacity of the Saks Fifth Avenue Parking Lot



OP's Proposal will create unacceptable traffic conditions

- OP's Proposal will add hundreds of additional vehicles to the traffic in each peak hour of the morning and evening rush hours and on weekends.
- For the Morning Rush Hour, OP's Proposed Development between Harrison Street and Western Ave will produce **1,450 new vehicle trips in the Peak Morning Hour.**
- For the Evening Rush Hour, OP's Proposed Development between Harrison Street and Western Avenue will produce **2,500 new vehicle trips in the Peak Evening Hour.**
- Even current zoning will have an impact on traffic, producing 500 new vehicle trips in the peak morning hour and 1,200 new vehicle trips in the peak evening hour.
- We should not allow OP's proposed increase in zoning limits to lead to further deterioration of traffic conditions.

Just Four Projects in Several Blocks North of Harrison Street Will Absorb **More Than 100%** of District-Wide Three-Year Demand for Multidwelling Units

Lord & Taylor: Land Area: 273,625 SF [6.28 acres]

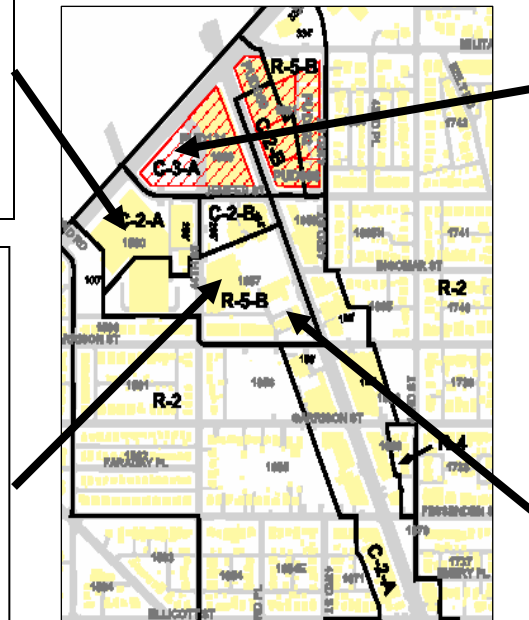
Current Zoning: C-2-A, lot coverage: 75%
Height : 50 feet [MOR]; 65 feet [PUD]
Gross Floor Area: **615,000 SF**, less if commercial
820,000 with a PUD.

OP Proposal: Height 110 feet for most of site
Gross Floor Area: **no stated limit, as much as 2.5 million SF.**

WMATA: Land area 164,140 SF [3.77 acres]

Current Zoning: R-5-B/C-2-B
Height: 50'/65' on NW portion [60'/90' with PUD]
Gross Floor Area: 380,000 SF (MOR)
640,000 SF (PUD), of which a maximum of
75,000-100,000 is non-residential
**Example: Commercial plus 500 apartments,
with underground parking.**
Bus Facility is a non-conforming use.

OP Proposal: Height: 110 Feet
Gross Floor Area: no stated limit
**Example: Commercial, 800 apartments, above-
ground parking, bus facility**



Surface Parking Lot: Land Area: 78,000 SF [1.79 acres]

Current Zoning: C-3-A; lot coverage: 75%
Height: 65 feet [MOR]; 90 feet [PUD]
Gross Floor Area: 312,000, mostly residential [MOR]
[351,000 SF, mostly residential with PUD]
Example: 60,000 SF ground floor retail, 250 condos

OP Proposal: Height: 110 feet
Gross Floor Area: no stated limit, as much as 780,000 SF
**Example: Retail, public parking garage, residential
[as many as 700 apartment units].**

Buick Site: Land Area: 22,500 SF [one half acre]

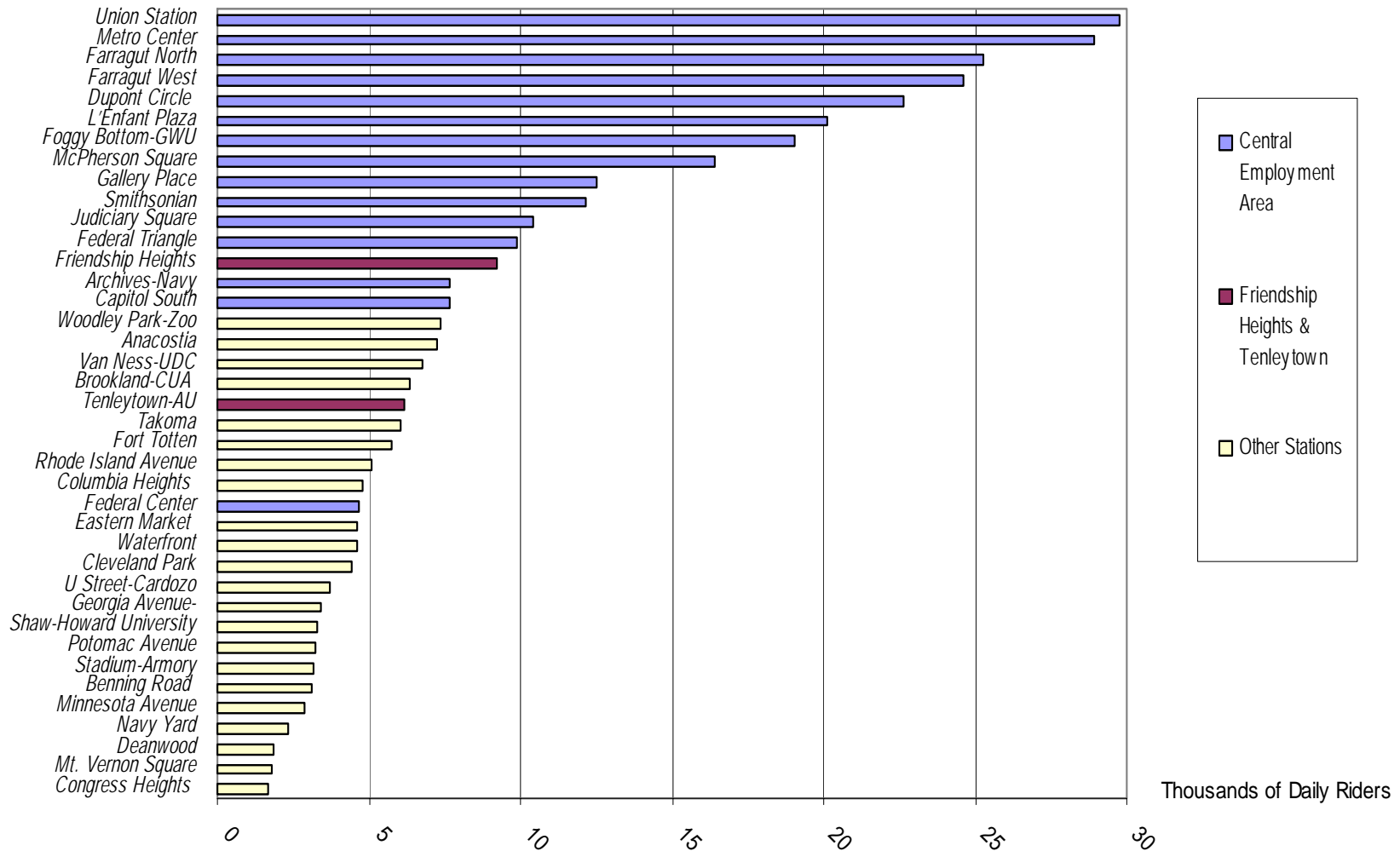
Current Zoning: R-5-B, lot coverage 60%
Height: 50 feet, 60 feet with a PUD
Gross Floor Area: 40,500 SF [MOR], [67,500 SF with PUD]
Example: 40-60 condos.

OP Proposal: 90 feet in Report
10 stories, 110 feet in on-site discussion with developer.
**Example: 20,000 SF of ground floor retail, and 100-120
condos.**

- **The OP Proposal provides for substantial increased retail, as well as 2,600 new housing units if the Lord & Taylor site is developed at half the rate indicated.**
- This would represent 26% of the **District-wide ten-year** demand for apartments and condominiums, using the OP estimate. If one assumes that the District will not substantially increase its share of region-wide demand, potential development on these four sites represents **33% of District-wide ten-year demand.**
- **Current zoning would allow development of 1,540 new housing units on these four sites, approximately 20% of District-wide ten-year demand, if the District maintains its 20% share of demand for new apartments.**

Friendship Heights Already Has the Highest Daily Metro Ridership of any District Metrorail Station Outside the Central Employment Area

Source: Daily Riders May 2001, WMATA 2002.



OP Plan Outstrips Fannie Mae Smart Growth Recommendation

		HOUSING UNITS PER ACRE
1.	Fannie Mae Smart Growth Recommendation	50*
2.	OP Plan, Friendship Heights Recommendations	200
3.	Takoma Park, DC Small Area Plan	22-32

What Does Smart Growth Mean for Housing?

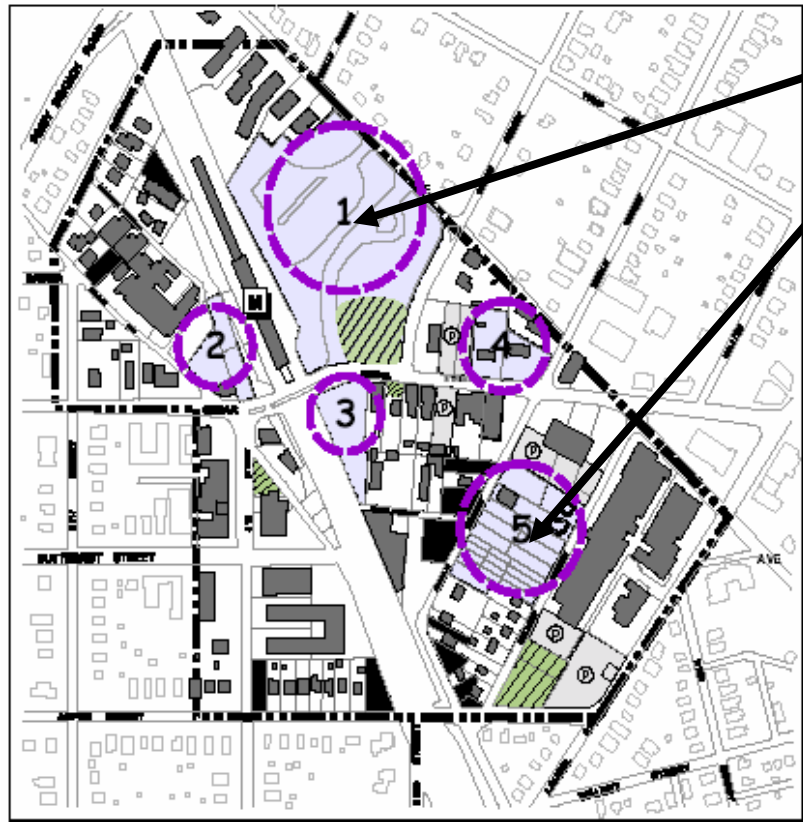
By Karen A. Danielsen, Robert E. Lang, and William Fulton, Fannie Mae Foundation

http://www.fanniemaefoundation.org/programs/hff/v1i3-smart_growth.shtml

The Takoma Park SAP Recommends **22-32 Units per Acre**
 Directly Across the Street from the Metro
 Fannie Mae Defines Smart Growth for Urban Infill as **50 Units per Acre**
 OP Recommends **200 Units per Acre** for Many Friendship Heights Sites
 Is This “Smart Growth”?

- Priority Redevelopment Site 1**
 (C-2-A)
Preferred use: Residential & Retail/Service
Total lot area: +/-6.8ac
Metro Facilities: +/-2.3ac
Village Green/Buffer: +/- 1.5 ac
Developable Area: +/- 3.0 ac
Proposed Mix: +/-65-95 townhomes @ 22-32 units/acre with +/-10,000sf ground floor retail/service space fronting upon Village Green
- Priority Redevelopment Site 2**
 (C-2-A)
Preferred use: Residential/Retail
Total lot area: +/-0.7ac
Proposed Mix: +/-50 apartments with +/-10,000sf ground floor retail
- Priority Redevelopment Site 3**
 (C-2-A)
Preferred use: Residential/Retail
Total lot area: +/-0.8ac
Proposed Mix: +/- 50 apartments with +/-5000sf ground floor retail
- Priority Redevelopment Site 4**
 (C-2-A)
Preferred use: Residential & Retail/Office
Total lot area: +/-0.8ac
Proposed Mix: +/-30 units above 2 floors of retail/office with +/-10,000sf each
- Priority Redevelopment Site 5**
 (R-5-A)
Preferred use: Residential
Total lot area: +/-2.2ac
Proposed Mix: +/-80 garden apartments @ 36 units/acre or +/-50 townhomes @ 22 units/acre

Figure L
 Priority Redevelopment Sites



Takoma Park:

- **Site 1:** Townhouses at **22-32 units per acre**
- **Site 5:** Garden Apartments at **36 units per acre** or townhomes at **22 units per acre**

Friendship Heights:

- **Buick Site:** 100 units plus Retail on a half acre: **200 Units per acre.**
- **WMATA Site:** 800 units plus Retail plus Above Ground Parking plus Bus Facility on 3.77 Acres: **Over 200 units per acre.**

Conclusion

- The existing zoning -- without any of the changes proposed by the Office of Planning -- permits greatly-increased density, building heights and development.
- The Community is not opposed to new development that is in conformance with the existing zoning, while recognizing that several recent developments in the Friendship Heights area have already exceeded current zoning, thereby supporting the case for lower densities for future developments so as not to overwhelm the already fragile existing infrastructure.
- Contrary to statements made by OP, the Community did not request that any new redevelopment plan take place. We do not need a new plan. The city conducted a plan years ago that was based on a careful factual basis. That plan led to the existing zoning, which residents have relied upon and do not want to see changed absent a compelling rationale.
- The OP plan purports to create a barrier that would prevent the encroachment of large-scale developments into single family neighborhoods. This is simply not true. OP's plan does just the opposite in many parts of the study area.
- Even if a new planning process will move forward over the Community's strong objections, any such plan must meet the following minimum criteria:
 - It must be based upon a solid, comprehensive factual basis that takes into account the entire area's infrastructural needs. OP has simply not done the necessary traffic and parking studies, school capacity analysis, fire, police, emergency service analysis, etc.
 - It must provide for green space and parks along the upper Wisconsin Avenue corridor. OP's plan does not do this.
 - It must provide a variety of viable development options for the Community to consider. The original request for proposals contained this requirement, but OP has presented only one "choice" for the Community to consider.
 - It must explain why so much development must be concentrated in Friendship Heights and Tenleytown, when so many other parts of the city are in desperate need of improvement.
 - Similarly, it must explain how development in Friendship Heights and Tenleytown will impact other areas of the District of Columbia. Thus, any useful plan must explain what effects development here will have on residential and commercial occupancy rates, construction and neighborhoods generally in other parts of the District of Columbia.

Next Steps

- You and Councilmember Mendelson have been fine supporters of our efforts to date. We need your continued support and advocacy with your fellow DC Council members, Mayor Williams and the DC Office of Planning.
- ANC 3-E and ANC 3-F have been sponsoring community forums to discuss the OP plan. At the first forum (of the three planned), residents were very strong in their opposition to the plan. You and your staff are welcome to participate in or simply observe these forums, so you can learn first hand how outraged the community is about the OP proposal. Your personal involvement and commitment will show the Community that you are being proactive on this critical issue.
- The OP plan contains so many serious flaws and is so lacking in underlying analysis as to be worthless. Nevertheless, if left unchecked, it will be touted as a blueprint for a Small Area Plan that will greatly detract from the quality-of-life for residents of our community. We urge you to take action so that the OP plan will not be presented to the DC Council. As our representative, we urge you to advocate this position to your colleagues, Mayor Williams and the Office of Planning.