

PO Box 11444 Washington, DC 20008

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## **VIA ELECTRONIC MAIL**

Heba ElGawish
Senior Cross-Systems Planner
DC Office of Planning
1100 4th Street SW, Suite E650
Washington, DC 20024
<a href="mailto:heba.elgawish@dc.gov">heba.elgawish@dc.gov</a>
planning.dc.gov

## Dear Ms. ElGawish:

I write on behalf of the Cleveland Park Community Association to comment on the draft development guidelines for Connecticut Avenue from Cleveland Park through Woodley Park. Attached please find a member survey conducted by the CPCA Board, which we share to inform the Office of Planning's analysis and which, as explained below, has also informed our advocacy on this matter. As discussed below, CPCA supports appropriately massed and designed development along Connecticut Avenue at heights consistent with the current maximum building heights along our business corridor (from Porter St to Macomb St), and calls upon OP to take into account additional considerations beyond those expressly reflected in the draft in finalizing the guidelines.

As our member survey indicates, while by no means universal, there continues to be robust neighborhood support for development, both as a means to increase housing and to help ensure the diversity and vitality of the business strip, with preservation of the current aesthetic of the corridor being a significant concern. Among respondents to the survey, as we have seen in prior engagement with our membership and larger community, there are essentially three similarly sized groupings of residents: those against further development of our business corridor; those for its development at a scale consistent with the maximum heights already existing within that corridor (on the order of up to 5 stories), and those supporting greater development such as proposed in the OP draft or more.

Further, development consistent with current maximum heights of existing buildings in our business corridor was supported by the Ward 3 Council Member at the time the Comprehensive Plan was

amended to allow for greater density on the Avenue. It is also consistent with the ongoing "Macklin" project within this corridor, a project that CPCA supported in part as setting an appropriate benchmark for the height and massing of further development along the corridor. It is also the scale that a developer familiar with the community and holding properties on the east side of this corridor, Steve Schwat, Principal at UIP Asset Management, has indicated would be viable and appropriate if they are able to assemble sufficient additional properties to pursue development here. Accordingly, we support OP's recommending development up to this scale as it appears to be viable, consistent with the overall preferences of neighborhood residents, and, therefore, likely to maximize neighborhood support rather than opposition.

In considering next steps for the guidelines, we also urge OP to conduct a more holistic planning analysis than the current draft reflects. Specifically, consistent with the Comprehensive Plan's mandate, we urge analysis of three additional issues beyond maximizing affordable housing, which is the sole rationale offered for the proposed height limit presented in the draft:

- What scale and design would best support the viability and suitability of the commercial strip? Given its market position as against other DC commercial corridors, the opportunities afforded by zoo patrons, and the extent to which this corridor can be anticipated to depend on patronage principally by residents of Cleveland Park and nearby neighborhoods, what scale and design most likely would draw customers to businesses on this corridor and the diversity of businesses that prospective customers seek?
- What scale and design plan would be compatible with the current and potential capacities of Cleveland Park business corridor? Factors include the increased demands for loading, unloading, moves in and out, sanitation, household deliveries, etc., associated with mixed use development, and capacity to satisfy them. Specific constraints include the limited alley area, inability to introduce other off-street options such as the circular driveways common to apartment complexes elsewhere along the Avenue, and the economics and logistics of introducing underground options within this corridor. Review of the conditions associated with zoning approval for the Macklin project, which relied substantially on curbside support on Connecticut Avenue, would be instructive, taking into account the potential changes considered to Avenue design and traffic controls that may limit parking, loading and unloading to one side of the Avenue within the next few years.
- How should the commercial to residential development transition of downtown DC inform such developmental planning? The implications of the radical, long-term drop in commercial property demand in downtown DC, potential for substantially more residential properties coming online in coming years as a consequence, and extraordinary public support being planned for such efforts, are clearly relevant to developmental planning for other areas of DC including Cleveland Park. For example, to what extent might the need for additional housing in Ward 3 or the importance of maximizing development along metro corridors be affected if a substantially larger proportion of DC residents are working regularly from home and of those DC residents working in offices downtown are also living there? How can planning for development elsewhere in DC best support the critical goal of revitalizing the downtown heart of the District?

We note that, beyond the precise 75-foot height limit, the draft guidelines offer relatively limited, often broadly framed, recommendations regarding the other aspects of developmental planning and design they address. Further, as reflected in these comments, the draft guidelines are silent on many important elements and considerations essential to their express concern development. We urge OP to issue a revised draft providing greater clarity with respect to other aspects of development and design, taking into account the considerations and constraints specific to our particular commercial corridor, and including clear visualizations of this specific corridor presenting viable scenarios. This would enable more informed public input and lead to a more robust guideline for future development of the corridor.

There is no particular import to publishing the final guidelines by a specific date this year. What is important is generating final guidelines that offers clear recommendations that will enable efficient, informed action on specific developmental proposals, minimizing acrimony, and supporting developmental outcomes consistent with community needs.

We applaud OP's efforts to address the need for affordable housing in a meaningful manner, and we support the recommendations of ANC 3C with respect to utilization of additional mechanisms to maximize availability of affordable housing as part of any development along this corridor. Providing affordable housing for families is a particular concern as well as for older residents on limited incomes in our community. CPCA stands ready to continue to work with OP, other components of DC government, and other partners, to ensure that Cleveland Park is both a diverse and thriving community, welcoming to all.

We thank OP for its efforts to develop informed guidelines for future development of a central element of our community, and believe that action consistent with these comments will best serve our neighborhood while appropriately addressing the needs of the larger DC community.

Thank you for your attention and consideration.

Sincerely,

John Barlow Weiner

President

Encl.