

SPRING VALLEY • WESLEY HEIGHTS

Citizens Association

WASHINGTON, D.C.

4601 Tilden Street NW

Washington, D.C. 20016

November 30, 2020

The Honorable Phil Mendelson
Chair, Council of the District of Columbia
1350 Pennsylvania Avenue NW
Suite 504
Washington, D.C. 20004

Dear Chairman Mendelson:

The Comprehensive Plan Amendment Act of 2020 (Bill 23-736) proposes to modify the District of Columbia Comprehensive Plan Act of 1984 (as amended), including the Future Land Use Map (FLUM), for the purpose of guiding future growth and development in the District of Columbia. The Spring Valley-Wesley Heights Citizens Association (SVWHCA) submits this statement on the legislation in lieu of testifying at the Committee of the Whole Public Hearings on November 12-13. We appreciate that the Council is working to ensure that groups, like ours, have an opportunity to comment on the proposed amendments to the Comprehensive Plan and is committed to considering these comments prior to taking a vote on the proposed amendments next year.

The SVWHCA was established in 1952 and is the longest continuous citizens group representing the interests of the Spring Valley and Wesley Heights sister-neighborhoods. The SVWHCA is organized under the laws of the District of Columbia and registered with the Corporations Division of the DC Department of Consumer and Regulatory Affairs (DCRA).

On issues tied to urban planning and growth, the SVWHCA has focused traditionally on neighborhood impacts and whether proposals for growth and development promote neighborhood livability. Based on our review of the FLUM proposed in Bill 23-736, the amendments to the FLUM proposed by the Office of Planning (OP) and incorporated into the legislation could alter, if not eliminate entirely, the small commercial retail district in Spring Valley. SVWHCA opposes these changes to the FLUM.

Nearly 80 percent of residents responding to an online poll conducted by SVWHCA indicated their opposition to these proposed changes.

Specifically, the FLUM proposes to alter the designation for Square 1500 which is currently classified as commercial low density (CLD). Square 1500 which is bordered by

Massachusetts Avenue NW, Fordham Road NW, and 49th Street NW, falls within the boundaries of the area represented by SVWHCA. Square 1500 houses the Spring Valley Village Shopping Center, a prototype of the 1920s neighborhood drive-in clustered shopping center, which was designed to complement the neighborhood and to “control commercial sprawl” in a low density residential neighborhood.

Bill 23-736 proposes to alter the designation for this site from CLD to CLD **and** Residential Moderate Density (RMOD).

Opposite Square 1500 on Massachusetts Avenue is Square 1499 (Lots 8, 802, and 803), also now classified as CLD and which now houses the Massachusetts Avenue Parking Shops, known today as the Spring Valley Shopping Center, another low rise shopping center that is one of the oldest planned neighborhood shopping centers in the metropolitan area.

As with the Spring Valley Village Shopping Center site, Bill 23-736 proposes to alter the designation for the Massachusetts Avenue Parking Shops from CLD to CLD and RMOD. Square 1499 (Lots, 8, 802, and 803) falls outside the official boundaries of the SVWHCA as outlined in the association’s bylaws. However, future development of these sites – located on both sides of Massachusetts Avenue – will have a significant and direct impact on residents of the area represented by the SVWHCA.

Both shopping centers were designated as historic landmarks in 1989 and listed on the DC Inventory of Historic Sites. SVWHCA took a leading role in securing the historic designation for both shopping centers. Both sites were designated in 2003 for inclusion on the U.S. Department of the Interior’s National Register of Historic Places. As you know, any additional development at these sites would require approval by the DC Historic Preservation Review Board (HPRB).

These two low density shopping centers are only two blocks from the DC-Maryland border and currently serve the day-to-day needs of the surrounding community.

SVWHCA opposes the RMOD designation for these two sites. The RMOD designation would allow the addition at these sites of 65-foot (50 feet + a 15-foot penthouse) multi-unit residential buildings. PUD rules would allow 80-foot (65 feet + a 15-foot penthouse) buildings at these sites. The RMOD designation is simply inconsistent with the character of the low density residential neighborhood that the commercial low density strips were intended to serve. Moreover, the RMOD classification is so incompatible with the sites as to permanently alter the historic character of the two shopping centers and compromise their historic designation. Adapting the sites in such a way as to add stories and “build up” the existing buildings would also be in conflict with the characteristics and features of the site that warranted their historic designation. The proposed changes to the FLUM for this site are at odds with the purposes of the DC Historic Landmark and Historic District Protection Act of 1978 as amended through March 2014.

The premise of the change proposed in the FLUM seems to be based on the fact that Massachusetts Avenue is a major Ward 3 gateway into the city and, thus, ripe for multi-unit

apartment buildings similar to those on Wisconsin and Connecticut Avenues, the other major Ward 3 gateways to the city from suburban Maryland. Unlike Wisconsin and Connecticut Avenues, Massachusetts Avenue has only limited commercially zoned space. In fact, there are only two commercial blocks on Massachusetts Avenue from Westmoreland Circle at the Maryland border to Dupont Circle in downtown Washington, D.C. – a distance of nearly five miles; and both commercial blocks are located in Spring Valley – far closer to low density neighborhoods in suburban Maryland than downtown D.C.

The two Spring Valley shopping centers are the only retail on Massachusetts Avenue along this gateway from where Massachusetts Avenue begins at Goldsboro Road in suburban Maryland to Dupont Circle – a stretch of nearly eight miles.

There are no extended commercial blocks along Massachusetts Avenue as is the case on Wisconsin and Connecticut Avenues. Both shopping centers in the Spring Valley commercial district are surrounded – even on Massachusetts Avenue – by single family low density residential homes stretching all the way on Massachusetts Avenue from where it begins at Goldsboro Road in suburban Maryland to Ward Circle at American University.

The surrounding Spring Valley neighborhood was designed as a suburban-type community. The neighborhood, including the small two block low density commercial area, still today retains the characteristics of a low density suburban-type residential neighborhood that city agencies, until now, have worked to protect. The proposed FLUM seeks to add more urban sprawl and growth to an area that was planned in such a way precisely to avoid such sprawl, including the added traffic – much of which would need to use existing narrow residential streets for access and egress.

The retail area at Squares 1500 and 1499 are designed primarily to serve the surrounding neighborhood. Although located on a bus line, they are more than a mile from the nearest Metrorail station. So, the primary purpose of the commercial retail area is to enhance the livability of the surrounding neighborhood. The proposed FLUM, if enacted, would put the future of that low density retail commercial service area at risk. The proposed FLUM amendment would, in effect, incent a developer to remove the existing retail and convert the site to apartment buildings – or, alternatively, to add height to the existing buildings putting the site's historic designation in jeopardy.

We recognize that adding new housing in Washington, D.C. is OP's highest priority, as agency staff have indicated in numerous zoning hearings over the last year. We support adding new housing in the District where possible, but not every commercial space in the District is appropriate for residential housing or the higher density housing proposed by OP.

SVWHCA believes the FLUM should prioritize the preservation of low density commercial sites that offer neighborhood-serving retail services to the same degree that OP seeks to incent the development of new multi-unit moderate density housing. This should not be a gambit between two competing priorities (e.g. preserving neighborhood retail vs. adding higher density multi-unit housing), but that is precisely the effect of the amended FLUM.

The neighborhood has fought for many years to protect these retail services in a low density commercial setting, including seeking to preserve the historic landmarks that house those services in the late 1980s. At the time, there was strong support from OP and other city agencies for protecting the character of the low density commercial zone in Spring Valley. In fact, OP's then-Director Fred Greene even recommended downzoning Square 1500 and 1499 from C-2-A to C-1 or alternatively create an overlay zone at the site to "protect the existing character, use, density, scale, and relationship of the area to the surrounding residential communities."

Although many years have passed and OP's priorities are significantly different than in the late 1980s and early 1990s, the need and demand for the preservation of neighborhood retail services has not changed. The city still benefits today from the strong, vital, and livable neighborhoods that city officials had the foresight to protect three decades ago. Amending the FLUM, as OP proposes, puts the existing retail services in our neighborhood at risk.

SVWHCA recognizes that the city has made the addition of new apartment-style housing a priority, but it is paramount that the District achieve these housing goals without compromising the low density character of neighborhoods and the services available in those neighborhoods, including retail and other commercial services. They are the lifeblood that sustain our neighborhoods – not just in Spring Valley, but across the city – and make our neighborhoods more livable and encourage people to continue to reside within the city's boundaries.

The proposed amendments to FLUM seek to minimize the importance of retaining the character of existing neighborhoods. This is a short-sighted approach by city officials that could result in a new out-migration from the city – not to escape the diversity of our city, as some advocates for growth may suggest – but to escape the type of urban sprawl that motivates people to avoid or leave higher density neighborhoods within the city center in favor of the lower density available in neighborhoods beyond the city center, like the neighborhoods represented by the SVWHCA.

OP seems to have taken a "boilerplate" and "cookie cutter" approach to amending the FLUM with the proposed changes to low density commercial areas instead of working to preserve and celebrate the character, use, density, and scale of neighborhoods that makes Washington, D.C. such a desirable place to live.

We also join with the Spring Valley West Homes Corporation, whose homeowners have indicated their opposition to changes in the FLUM to Area 5009. Area 5009 also falls within the boundaries of the SVWHCA. Area 5009 which is located across 49th Street from Square 1500 and across the corner from Square 1499, is also currently designated as CLD. The FLUM proposes to add RMOD to this zone as well. These small commercial buildings house important medical and dental services with some first floor retail.

SVWHCA played a central role in the discussions leading to the development of Area 5009 in the early 1980s. When the Spring Valley West community was envisioned, the developer initially proposed the construction of multi-unit apartment buildings at the Area 5009 site. But, this was rejected at the time by OP for the same reasons that it recommended an overlay zone for the Spring Valley shopping area nearly a decade later: that multi-unit apartment

buildings would be inconsistent with the surrounding low density residential neighborhoods in character, use, density, and scale.

Consequently, the developer and the neighborhood agreed that the area referenced now as Area 5009, where the developer initially hoped to build multi-unit housing, would be set aside instead strictly for low density commercial development, as it was originally intended when the land was first zoned by the city. In fact, SVWHCA entered into a formal agreement in October 1983 to preserve as a low density commercial zone the land that OP now seeks to reclassify as RMOD and that would enable the development of 65-foot tall multi-unit higher density housing at the site. The 1983 agreement limiting buildings to three stories is still in effect.

The goal of the agreement entered into in October 1983 was to develop a portion of the Spring Valley West site with new low density housing and build additional low density office buildings at the commercially zoned site along Massachusetts Avenue. It was intended that these low-rise office buildings would house a range of professional services that were (and still are today) valued and essential for the surrounding neighborhood.

SVWHCA believes the FLUM should recognize that these professional services for residents also are a priority. As with retail services, the FLUM should not put the availability of these services at risk. And as with Squares 1500 and 1499, Area 5009 is surrounded by single family residential homes.

The combined effect of OP's proposals for Square 1500, 1499, and Area 5009 is a recipe for added density and the congestion that comes with it – none of which is consistent with the surrounding low density residential neighborhood.

We believe the goal of the FLUM should be to retain and preserve the vitality of residential neighborhoods. Although it is important to add more housing where possible, this housing should make our neighborhoods stronger and not lead to the potential loss of services, including retail and professional services. These services add value to a neighborhood and the city as a whole. There is as much public interest in preserving the full range of commercial services in a neighborhood as increasing the availability of multi-unit housing – even more so when this housing is likely to be targeted to a luxury market, as is likely to be the case in Spring Valley.

Without these valued and essential services within our neighborhood, residents will most likely seek and find them in neighboring suburban Maryland which is much closer and easier to access for Spring Valley residents than other parts of the city.

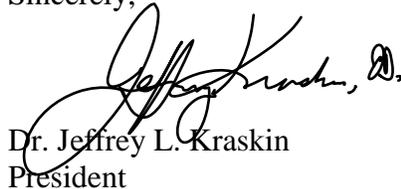
It is also important to note that this process of revising the Comprehensive Plan began before the onset of the COVID-19 pandemic. Nobody could have speculated with any reasonable degree of certainty that the U.S. would fall victim to such an infectious virus with the implications for the economy and all facets of our lives. The COVID-19 surge has had a dramatic impact on the type of services that we are advocating in this letter to preserve. Some urban planners suggest that the COVID-19 pandemic may lead to out-migrations from center cities as residents seek larger living spaces and more open spaces.

City planners and the DC Council need to reconsider the amendments to the Comprehensive Plan, including the proposed new FLUM, within the context of the COVID-19 impacts, especially since COVID-19 has shown how vulnerable we are to such viruses. In fact, public health experts have warned that COVID-19 may be the first of many such viruses that could impact our way of life. The Council should not consider the Comprehensive Plan in a vacuum given all our city, its businesses, and residents have experienced over the last year due to COVID-19 that are likely to have long-term implications.

In conclusion, then, the FLUM should have as its priority promoting the vitality and livability of our city's neighborhoods. While creating opportunities for new development, the FLUM amendments proposed for our neighborhood could strip the area of the range of services that add to our neighborhood's vitality and livability while altering the use, density, scale, and relationship of the commercial zones to the surrounding residential community.

We know first-hand and applaud your commitment to ensure a full debate on the issues raised by the proposed changes in the FLUM. As a one-time neighborhood advocate, yourself, you – probably more than any other current Councilmember – understand the relationship between the FLUM and the quality of life for DC residents. Thank you for keeping the record for the hearing open until December 3 and providing the opportunity to submit comments on the proposed Comprehensive Plan legislation.

Sincerely,



Dr. Jeffrey L. Kraskin
President

cc: Councilmember Mary Cheh
Councilmember Anita Bonds
Councilmember Robert White
Councilmember Elissa Silverman
Jennifer Steingasser