

**ADVISORY NEIGHBORHOOD COMMISSION 3E**  
**TENLEYTOWN • AMERICAN UNIVERSITY PARK • FRIENDSHIP  
HEIGHTS**

Lisner-Louise-Dickson-Hurt Home  
5425 Western Avenue NW  
Washington, DC 20015

**Resolution Responding To Office of Planning's Draft Retail Action Strategy**

**WHEREAS**, the Office of Planning has released a Draft Retail Action Strategy for Tenleytown and Friendship Heights and has asked that ANC 3E submit comments to it by November 14, 2008. Although we appreciate the attention being paid to retail development in Tenleytown and Friendship Heights and are eager to see more vibrancy along the Wisconsin Avenue Corridor, we find there to be significant errors in the draft report. We felt it was necessary to set forth our specific objections; they are spelled out in detail below. In addition to this resolution, however, ANC 3E passed a second unanimous resolution this evening in which we endorse the concept of the strategy and make clear our desire and intention to work with OP to reach our shared goal of a thriving retail sector.

**WHEREAS**, the Retail Action Strategy Working Group Briefing Book, dated September 2007, states that the Strategy will be to “examine ways to strengthen the city’s retail base at both the citywide and local scale,” “promote vibrant commercial districts with a broad range of retail businesses in all neighborhoods,” “create expanded opportunities for small and local retailers; build upon and support other public efforts, such as neighborhood plans and the Great Streets initiative,” and “help guide private investment,” and does not include any of the many other goals and policies of the Comprehensive Plan.

**WHEREAS**, Whereas the September 2007 Working Group Briefing Book describes the working group formed by the Office of Planning as including only “a cross section of the District’s retail community, and includes individuals working in retail, real estate development, retail leasing, local community development, economic development and Main Streets organizations, and public policy research organizations, as well as selected related economic development and planning officials” and does not include the ANCs or the residents of those areas.

**WHEREAS**, Friendship Heights has a successful retail area, which includes Neiman Marcus, Lord and Taylor and Saks Fifth Avenue Mens Store in the DC portion of Friendship Heights, as well as high end kitchen and home furnishings offered at Roche Bobois, Williams Sonoma, Sur la Table, and Pottery Barn along with other highly desired retail such as Borders Book and J. Crew, Filene’s, Loehman’s, and TJ Maxx.

**WHEREAS**, according to the retail rental company for one of the DC buildings in the Friendship Heights retail area, the retail area serves as a destination for residents and daytime employees within one, three or five miles. The residential population within

those ranges is 26,301, 160,354, and 527,277, respectively. The average household income within those ranges is \$173,898, \$156,536 and \$119,235, respectively. And the daytime employment populations for the one, three and five mile ranges are 20,741, 105,138, and 526,957, respectively. Finally, 29,000 vehicles per day pass on Wisconsin Avenue, 24,700 vehicles per day pass on Western Avenue, and 19,000 trips are generated by the Friendship Heights Metro stop.

**WHEREAS**, Friendship Heights is designated in the 2006 Comprehensive Plan as a “regional center” and Policy LU-2.4.4 limits the heights and densities of development in that area to that which is appropriate to the scale and function of development in the adjoining communities:

“Policy LU-2.4.4: Heights and Densities in Regional Centers: Maintain heights and densities in established and proposed regional centers which are appropriate to the scale and function of development in adjoining communities and which step down to adjacent residential areas, and maintain or develop buffer areas for neighborhoods exposed to increased commercial densities. Section 312.8”

**WHEREAS**, the Draft Retail Action Strategy for Friendship Heights recommends a scale of development provided by Chevy Chase Pavilion and Mazza Gallerie, rather than development in the adjoining communities and these recommendations are inconsistent with the Comprehensive Plan.

**WHEREAS**, in February 2004, ANC 3E determined that the UWACS Draft Plan contained no analysis to determine whether the infrastructure can even support the amount of development that would be allowed under current zoning, and in particular was lacking information on:

1. Existing limits of the public transportation services, and the ability of those systems to meet increased demand in the neighborhood,
2. Public safety needs, including the availability of fire and emergency medical services and evacuation capabilities,
3. Impact on Janney Elementary School, which is already operating well beyond capacity, and the
4. Ability of the local roads, where crucial intersections are already documented as operating at undesirable levels, to absorb additional traffic.

**WHEREAS**, in September 2005, Ellen McCarthy, director of the Office of Planning, agreed to withdraw the Upper Wisconsin Avenue Corridor Study draft plan.

**WHEREAS**, the Draft Retail Action Strategy relies on the analysis of the UWACS, stating that “some of these submarkets have been the subject of past studies, so

additional, in-depth demand analysis was considered unnecessary,” and the demand studies in the UWACS were found to be seriously flawed.

**WHEREAS**, the Draft Retail Action Strategy for Friendship Heights seeks to revisit some of the most controversial recommendations of the UWACS.

**WHEREAS**, the Draft Retail Action Strategy for Tenleytown also seeks to revisit some of the most controversial recommendations of the UWACS for that area.

**WHEREAS**, in response to ANC 3E’s request for infrastructure analysis relating to schools, including Janney, which is operating beyond capacity, public safety needs, public transportation, traffic and parking, a request which included a description of areas where the infrastructure was already stressed at current development levels, the Office of Planning requested only an analysis of the impact on traffic, which was the Wisconsin Avenue Corridor Transportation Study ( the “WACTS”).

**WHEREAS**, the WACTS demonstrated that the transportation infrastructure on the upper Wisconsin corridor did not have the capacity to support the development allowed within the current zoning envelope and none of the other infrastructure analyses were ever initiated.

**WHEREAS**, the scope of inquiry in this Draft Retail Action Strategy relates only to a limited goal of enhancing retail, and does not consider any of the policies that are central to the basic assessment of the appropriate heights and densities for the area in and near the Friendship Heights regional center, the Tenleytown multi-neighborhood center or the commercial corridor in between.

**WHEREAS**, the methodology used in the draft Friendship Heights Retail Action Strategy and the draft Tenleytown Retail Action Strategy is flawed, where, for example, the draft Friendship Heights Retail Action Strategy shows 7,807 households in the primary and secondary trade area in 2007, growing to 8,111 households in 2012, but does not include daytime employees in their study. Meanwhile, retailers view the current trade area as ranging from one to five miles and including a residential population of 26,301 to 527,277 and a daytime employee population of 20,741 to 526,927, depending on the type of store. The consultants draw strong, unjustified conclusions about family composition and age distribution of residents based only on the average household size and median age.

**WHEREAS**, the draft Friendship Heights Retail Action Strategy includes discussions that demonstrate that the consultants were unfamiliar with approved development plans such as:

1. The consultants estimate that the population in the primary and secondary market areas will grow by 352 persons between 2007 and 2012, and yet there are 432 apartments nearing completion in the primary residential market area.

2. The consultants include a discussion of possible development at the Geico site, including in the “threats” section the following language: “The expansive Geico’s headquarters site represents a great opportunity for retail development; however its location may increase retail leakage from the District into Maryland and further increase competition for retail tenants, depending on the timing of the redevelopment effort,” and similarly the consultants speculate on page 16 about the availability of significant retail tenants should the Geico site be developed first. The consultants seem to be unaware of the fact that Montgomery County has approved plans for the Geico site that include replacing the 514,000 square feet of office space with 500 housing units and nearly 850,000 square feet of office space, but no retail, and Geico has recently requested and received an extension on that approval.

3. The consultants do not seem to be aware of approved development in the area, including the Akridge PUD for 5220 Wisconsin Avenue and the Babes PUD for 4600 Wisconsin Avenue (in the Tenleytown area), as well as Roadside’s matter of right residential project for 5201 Wisconsin Avenue.

**WHEREAS**, the Friendship Heights Retail Action Strategy inconsistently defines the geographic area covered by the strategy and includes Lord & Taylor in the recommendations but makes no mention of the area north of Harrison Street to Jenifer Street between 44th Street and 45th Street where Lord & Taylor is located and excludes Lord & Taylor from the Core Commercial Area map and the Submarket description.

**WHEREAS**, the draft Friendship Heights Retail Action Strategy includes statements that indicate that the consultants are unfamiliar with the zoning in the area, stating that “The residential area immediately surrounding the submarket is zoned as moderate-density general residence; moving further away from the submarket, the zoning switches to one-family, semi-detached dwellings and row dwellings,” and with the exception of some residentially-zoned areas which are included in the submarket rather than the surrounding area, the zoning outside the submarket is all low-density residential – single family detached and semi-detached dwellings, not even row dwellings, although there are some pre-1958 row-dwelling in the area.

**WHEREAS**, the two draft Retail Action Strategy documents include many errors in the description of retail in Tenleytown and Friendship Heights:

1. The consultants state that “The existing retail caters to primarily an older, female crowd; this lack of customer diversity limits the potential for a dynamic and varied shopping experience,” but Friendship Heights, DC includes a variety of stores, which appeal to a diverse group of customers, especially on weekends. The stores appeal to a wide range of age groups, and include Saks Fifth Avenue’s menswear department and Everett Hall,

as well as a number of retailers that sell apparel for both men and women, ranging from Neiman Marcus to Lord & Taylor to Loehman's to TJ Maxx.

2. The consultants state that "There is little 'sense of place' in the submarket," and yet Friendship Heights is, in fact, a well-recognized retail destination, a fact that is recognized in other sections of the draft report.

3. In listing the stores on page 10, the consultants excluded the entire neighborhood-serving portion of the Chevy Chase Center, and included only stores in the luxury "Collection at Chevy Chase" portion of that project.

4. The listing of stores at Node 1 omitted all the stores at Chevy Chase Plaza (Roche Bobois, AT&T Wireless, New Balance, Everett Hall and several other stores) and listed the stores at Friendship Centre as being in Chevy Chase Pavilion. The list also excluded many specialty stores, the Embassy Suites hotel and two health clubs.

5. The consultants seem to try to distinguish the retail south of Western Avenue from that to the north, and failed to note that the stores north of Western Avenue also have a mix of price points, including the Gap, Talbot's and Chico's, along with more upscale stores.

6. The consultants state that "There is a significant price differential between Chevy Chase, MD and Chevy Chase, DC; this disparity encourages higher-end retailers to locate on the Maryland side," and while the relative new "Collection at Chevy Chase" was built to include only luxury retail, Chevy Chase DC also includes a number of high end retailers including Neiman Marcus, Saks, Harriet Kassman, Everett Hall and several high-end furniture and home furnishing stores.

7. The consultants have omitted many businesses from the lists in the draft Tenleytown Retail Action Strategy, such as Matisse, Chat Noir, 4912 Thai and Dancing Crab, and so the recommendation that the retail needs included "higher-end sit-down restaurants" is questionable. Similarly, York Flowers and Happy Paws were listed on page 10 and Petmac was omitted. Yet the study recommends a "neighborhood pet shop and florist."

8. The consultants listed Park Place Furniture in its list on page 10 of the draft Friendship Heights Retail Action Strategy, and yet on page 17 recommend "a high-end garden and home store such as Smith and Hawken or a similar locally-owned specialty store." Park Place on the 5100 block of Wisconsin Avenue is a similar specialty store.

**WHEREAS**, the draft Tenleytown Retail Action Strategy includes frequent references in support of a public private partnership mixed-use project on the library site.

**WHEREAS**, the Janney SIT/LSRT has rescinded all support for a development project, and ANC 3E, Friends of the Tenley-Friendship Library, Tenleytown Neighbors Association, Friendship Neighborhood Association, Tenleytown Historic Society, CSTO, Friendship-Tenley Citizens' Association, the Heights Foundation, Inc., and Tenley Campus Neighbors are on record as opposing a mixed use development project on this site, there is a consensus among community stakeholders for the Janney Elementary School and the Tenley-Friendship Neighborhood Library that the public/private development project should be abandoned and that the reconstruction of the Tenley-Friendship Library should proceed immediately.

**WHEREAS**, the draft Friendship Heights Retail Action Strategy presumes the redevelopment of several sites, such as the Western Bus Garage, the adjacent Chevy Chase Metro Plaza at the southwest corner of Jenifer and Wisconsin and the ABC Radio office building on the southwest corner of Jenifer and 44th Street.

**THEREFORE BE IT RESOLVED** that ANC 3E requests that the Office of Planning remove all recommendations that go beyond the scope of streetscape or formation of a BID that would include only commercial properties. That is, the Office of Planning should remove all recommendations that suggest increased scale or increased heights and densities, or recommendations that suggest redevelopment of particular sites or zoning incentives or linking zoning incentives with projects in other parts of the District.

**BE IT FURTHER RESOLVED** that the following recommendations or suggestions, which go far beyond the scope of the analysis, should be removed from any future drafts of this document:

1. A public-private partnership at the Tenley-Friendship Library and/or the Janney Elementary School.
2. The recommendation that the Western Bus Garage, Chevy Chase Metro Plaza and the ABC Radio office building be redeveloped at a scale that "is appropriate in scale to the Retail Anchors in Node 1."
3. The recommendation that any parcels, including the Chevy Chase Metro Plaza (which is already three stories of retail) and the Lord & Taylor parking lot, be redeveloped with three or more stories of retail.
4. The recommendation to encourage redevelopment of Lord & Taylor parking lot and Metro Bus Western Division lot, through a package of incentives that may link the Lord & Taylor lot development to other desirable retail development locations in the District such as Downtown DC, or to open discussions between Washington Metropolitan Area Transit Authority ("WMATA") and the Washington DC Economic

Partnership (“WDCEP”) on the development potential of the Western Bus Garage lot, exploring potential use of air rights along Wisconsin Avenue.

5. General recommendations to increase heights and densities in Tenleytown

**BE IT FURTHER RESOLVED** that the Tenleytown Retail Action Strategy and the Friendship Heights Retail Strategy be withdrawn unless or until the consultants do the necessary research, without additional funding, to correct the errors in methodology and fact in these documents.

**BE IT FURTHER RESOLVED** that any new draft recommendations be consistent with the Comprehensive Plan, and in particular be consistent with the policy on heights and densities in regional centers, Policy LU-2.4.4, and not include any recommendations that exceed that which is appropriate to a study of this nature, i.e., possible streetscape improvements, formation of a BID or other group, limited to non-residential property-owners in the area, or coordination through the existing Friendship Heights Task Force, and not include any recommendations for incentives for increased development at any site, for increased heights or densities or other changes in zoning or requests for zoning flexibility, or any recommendations that suggest redevelopment of sites or zoning incentives in Friendship Heights be linked to development on other parts of the District.

ANC 3E approved this resolution at its regularly scheduled meeting on November 13, 2008, which was properly noticed and at which a quorum was present. The resolution was approved by a vote of 3-1. Commissioners Amy McVey, Lucy Eldridge, Anne Sullivan and Matt Frumin were present.

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Amy McVey, Chair, ANC 3E