

District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 2E
3265 S Street NW
Washington DC 20007

RE: Advisory Neighborhood Commission 2E Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Murphy, Putta, Gibbons, Landre, Palmer, Lohse, Miller, and Burdman:

On behalf of the Office of Planning (OP), I would like to thank you and your community for taking the time to review and provide critical feedback on the Draft Comprehensive Plan Update.

The feedback we received during the 2019-2020 Public Review period has provided OP with critical guidance from the community and reaffirmed policies not already captured during previous engagement for this Comprehensive Plan amendment.

Resolution Review

Responses to individual comments and recommendations within the Advisory Neighborhood Commission (ANC) resolution are outlined in the public review digest included in this response. After careful review, components of the resolution received from ANC 2E, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan). Any feedback received that supported existing Comp Plan language has been marked as “Support. No integration needed”.

During OP’s review, numerous recommendations received from ANC 2E were deemed to be sufficiently covered throughout the Comp Plan. In such cases, these components have been marked as “Acknowledged” in the public review digest. The digest provides guidance on where complementary and appropriate language exists in other Elements. In these instances, OP did not add additional language to the Comp Plan; however, where appropriate, OP has added cross referencing language.



Feedback received that was beyond the scope of the Comp Plan (i.e. operational, budgetary, or regulatory items) has been noted, marked as “No” in the public review digest, and more appropriate programs or agencies have been identified.

The Commission's resolution included: improving inclusive language around persons with disabilities; retail amenities in Upper Northeast; and reinstating the Planning and Development Priorities section of the Upper Northeast Area Element. The Mayor’s Proposal includes updates based on the Commission’s recommended.

Next Steps

While OP made every effort to incorporate much of the feedback, in some instances OP was unable to incorporate all components of the resolution as part of this amendment. Nonetheless, all resolutions will be sent to the DC Council and have been reviewed and saved as guidance for a future Comp Plan rewrite and near-term planning efforts. I would also like to set up a time to further discuss your resolutions.

Background on Changes to the Comprehensive Plan

The Comp Plan is a high-level guiding document that sets an inclusive, long-term vision for the physical development of the District of Columbia. The purpose of the Comp Plan is to help guide the District’s growth and change, resulting in positive outcomes for both current and future residents of the District.

The Comp Plan establishes a context and sets broad goals to inform public decision-making and future fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation.

In response to the ANC Resolutions, the Comp Plan was updated when feedback was deemed consistent with the document’s scope, was an omission of information, or was not otherwise referenced in the Citywide or Area Elements.

Issues, policies, and programs outside the scope of the District’s physical development were not included in this revision. Additionally, the Comp Plan is not intended to provide guidance on operational, budgetary, or regulatory matters. While this feedback was not amended in the Comp Plan, it is extremely valuable to OP as we undertake neighborhood planning initiatives and to help shape the work of our sister agencies.

Background on Public Review

The Draft Comp Plan Update was released on October 15, 2019. A notice was published in the District of Columbia Register that announced the publication of the Plan and the commencement of the Public Review period. The Public Review period was extended in response to requests from ANCs and other community groups, providing 88 days for the public and 123 days for ANCs. The Public Review period was open to all stakeholders from October 15, 2019 through January 10, 2020. Advisory Neighborhood Commissions were given until February 14, 2020 to submit official actions. Prior to the release of the Draft Comp Plan Update, two

training sessions were held for ANC commissioners on September 19 and 21, 2019. Eight community meetings were held across all eight wards during the months of November and December, and an additional two ANC work sessions were held in December 2019.

Public feedback received from October 15, 2019 to January 10, 2020 through the plandc@dc.gov email account will be packaged and sent to the DC Council. In addition, ANC Resolutions received from October 15, 2019 to February 14, 2020 through the plandc@dc.gov email account or through the resolutions.anc.gov portal will also be packaged and submitted to the DC Council. The Mayor's Comprehensive Plan Update will be transmitted to the DC Council in April 2020 along with all ANC Resolutions and public feedback.

The 2019-2020 Public Review Period, along with previous engagement efforts dating back to 2016, provided OP with valuable community feedback, resulting in a consistent and inclusive Draft Comp Plan Update. Thank you for submitting an official action that represented your community and for being an active and engaged leader during this Comprehensive Plan Amendment cycle.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Trueblood', with a long horizontal flourish extending to the right.

Andrew Trueblood

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 2E-1	2.14		001 - General Comp Plan Comments	The CP tells us that, "[A]pproximately 94,400 District residents – or 13 percent of the total population – live with a physical or mental disability." Despite this fact, much of the CP uses language to describe people with disabilities that is outdated and offensive. Similarly, its use of the word "accessible" is repeatedly unclear in meaning, especially as to whether it means disability access or something else. ANC 2E believes that this language should be revisited and changed accordingly.	01-Yes	The Comp Plan was edited to remove outdated language.
ANC 2E-2	2.14	ED-2.2.A	Economic Development	ANC 2E believes that the Retail Agenda referred to in Action ED – 2.2.A: Update Retail Action Agenda (§708.12) should include, "developing incentives/plans for addressing retail vacancies."	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 2E-3	2.14		Historic Preservation	In the Historic Preservation Element (Chapter 10), the CP deletes the Plan's statement that historic preservation is "an important local government responsibility" and suggests that historic preservation is merely "a valuable planning tool." ANC 2E believes that the history of Washington is at the very core of the city's appeal. While we must guard against overemphasis on preservation, ANC 2E believes the CP's suggestion that historic preservation is not an important local government responsibility is simply wrong.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 2E-4	2.14	Overview	Historic Preservation	Changes proposed for §1000.12 ("Overview"), which lays out the basic assumptions on which preservation policies are premised are alarming to ANC 2E. In one bullet, language that stated that the "basic assumption" of the plan is that the "protection" of historic properties is essential to public welfare is deleted. In another bullet, new language is inserted that says, "[p]reservation standards should be reasonable, and flexible enough in their application to accommodate different circumstances and community needs." ANC 2E is concerned that, taken together, these changes in language appear to be designed to weaken existing protections for historic properties.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 2E-5	2.14	HP-1.4	Historic Preservation	In §1003 ("HP-1.4 Evaluating Historical Significance"), the revised language no longer calls for protection of all properties that meet the basic test of significance. Instead, those properties would be "...considered for protection...according to preservation planning priorities." ANC 2E is concerned that this is but one of many examples in the CP of planning mandates being changed to create opportunities for the Office of Planning to exercise discretion to the detriment of historic preservation goals.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 2E-6	2.14	2108.6	Near Northwest	§2108.6 of the CP includes Georgetown in its discussion of areas with an excessive concentration of liquor licenses. This is outdated. ANC 2E ask OP to delete this reference to Georgetown. Unlike in the past, Georgetown is now combating commercial vacancies, and the number of restaurants in our community has declined since the 2006 Plan was written, so this language is no longer appropriate to Georgetown.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 2E-7	2.14	2107	Near Northwest	§2107 addressed Planning and Development Priorities for Near Northwest, but this section has been completely stricken. Many items in this section are still relevant, e.g. in 2107.2 "... zoning changes need to be consistently applied ..." OP should re-review this provisions to ensure all relevant parts are not stricken.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 2E-8	2.14	407.15	Transportation	§407.15 (under "Multi-Modal Transportation Choices") states that plans "for extending the DC Streetcar west to Georgetown are underway." This is no longer true. ANC 2E recommends that the CP be amended to address the lack of convenient and efficient transit access to and from Georgetown.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 2E-9	2.14		Arts and Culture	This chapter places no importance on enhancing/improving the culinary arts in DC. Culinary arts can help transform areas of the city, produce revenue, and provide professional training to residents who might otherwise not receive such opportunities. Moreover, the culinary arts place importance on sustainability, climate change, food waste and equality. ANC 2E asks that culinary arts be included in Chapter 14.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; New narrative following 1400.4 articulates a definition of culture that encompasses culinary arts, which applies to the entire element. Additionally, AC-2.2.6 Promote Local Cultural Identity and Traditions addresses this point.
ANC 2E-10	2.14	Overview	Arts and Culture	ANC 2E asks why "Creating a civic culture that attracts the creative class." was deleted from §1400.2 ("Overview")? Is this no longer a goal of DC? DC is a very expensive city in which to live. Some incentive for the creative class to base themselves here will help the city meet the CP goals. Having a creative class in all parts of the city means viewing the creative class as a population that requires infrastructure support, including creative housing options. The deleted language should be reinstated.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See the Arts and Culture Element new language added following 1400.4
ANC 2E-11	2.14	1411.2	Arts and Culture	Section 1411.2 regarding the importance of arts education is also proposed for deletion. ANC 2E does not understand why such a deletion would be made. The deleted language should be reinstated.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Arts education is now placed in section AC-4.4 Increasing Arts and Cultural Education and Participation.

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ANC 2E-12	2.14	1404.3	Arts and Culture	ANC 2E ask why the theme in §1404.3(under AC-1.2 "Art and Culture in Every Community) – the successful and recent creation of Art Districts in DC – is not being encouraged by the CP in new areas of DC? Beyond the deletions in §1404.3, §1404.6 deletes "and encourage the development of additional arts districts throughout the city". ANC 2E believes Art Districts – big and small – are critical to a first-class city. The deleted language should be reinstated.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See narrative pertaining to Arts and Culture 1.2 Art and Culture in Every Community and AC-1.2.6 Support Arts and Cultural Clusters.
ANC 2E-13	2.14	700.2	Economic Development	The critical economic development issues facing the city are set out in §700.2 in the "Overview" section of the Economic Development Element. Inexplicably, the CP calls for deletion of the bullet point that sets a goal of "enhancing and revitalizing the city's shopping districts." The decline in the number of retail establishments along Georgetown's commercial corridors is one of the critical issues faced by ANC 2E, and by ANCs in other areas of the city. ANC 2E asks that this bullet point be restored, and focus be placed on how existing shopping areas in the city can be promoted by the CP goals.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; This discussion is focused in section 2.2 The Retail Economy, where nuanced and segment specific challenges are addressed. Specifically, section 708.1 highlights the current challenges in Georgetown. Note, the original major challenge was included due to a high-rate of citywide retail spending leakage, which has been significantly reduced since 2006.
ANC 2E-14	2.14	ED-3.2.6	Economic Development	Rising operating expenses in areas of rapidly rising rents are already having a severe impact on small and local businesses. Therefore, ANC 2E recommends that the second sentence of Policy ED-3.2.6: Commercial Displacement (§714.11) should be revised to read, "Develop and implement programs to offset..."	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See related Actions ED-3.2.A Anti-Displacement Strategies and ED-3.2.B Business Incentives for additional information.
ANC 2E-15	2.14	H-1.1.B	Housing	The requirement of a "State of DC Housing Report" included in the §503.10 (Action H-1.1.B: Annual Housing Report and Monitoring Efforts) should mandate the inclusion of data on housing accessibility for people with disabilities and proposals to increase the number of these units.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comprehensive Plan establishes a context and sets broad goals to inform public decision-making and fine-grained planning efforts. It informs zoning regulations and capital budgeting. However, it does not have the force of law or regulation.
ANC 2E-16	2.14		Housing	ANC 2E notes that several residents, and other ANC's, have observed that no hard data has been issued to define what OP means by "affordability," and no data on whether "affordability" goals are being met. ANC 2E requests that OP provide such data so progress toward goals can be tracked.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Call Out Box-Callout Box: What is the Difference Between Housing Affordability and Affordable Housing?
ANC 2E-17	2.14	2500	Implementation	ANC 2E recommends that section 2500 be revised. Currently, the OP has established that it will be primarily accountable for reporting status of the CP by issuing status reports via various electronic communication tools such as social media. ANC 2E asks that the OP place greater emphasis on the OP proactively seeking, addressing and incorporating feedback from local bodies, especially the ANCs. Specifically, §2512 should be amended to require that the OP seek formal input from the ANCs. The CP will only be successful if the CP is well executed. The local communities will be on the front line of execution. We ask this addition would also apply to related plans such as MoveDC.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Communications, engagement, and participation process surrounding the implementation of the Comp Plan will continue to be improved upon. Additionally The Framework Element outlined principles around community participation in District planning and policies. See Framework Element, Section 220 for community participation in public processes.

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ANC 2E-18	2.14	Introduction	Introduction	In the introduction to the 2006 Comprehensive Plan the authors noted that D.C. Code §1-301.62(i) (since recodified as §1-306-01(b)(6)) provides that the purposes of the Comprehensive Plan are to "assist in the conservation, stabilization and improvement of each neighborhood and community in the District" (emphasis supplied). Nevertheless, and without amending the introduction, in the amended statement of the Land Use Goals (§302.1), the existing goal of protecting the ". . . stability . . . of neighborhoods in all parts of the city" is replaced with a goal of protecting the "affordability and equity" of neighborhoods. ANC 2E agrees that enhancing the affordability and equity of housing in neighborhoods in all parts of the city are critically important goals, but we view the suggestion that affordability and equity can only be achieved by sacrificing the stability of neighborhoods throughout the city both concerning and false.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The use of "stability" and "stable" as a descriptor or qualifier for a neighborhood was removed if possible throughout the document to address negative connotations, particularly as it also implies the inverse, "unstable" neighborhoods. In the Land Use Element, this issue is discussed further in the chapter as well. A study of neighborhood indicators is recommended, one that no longer uses the terms "stable" or implies "unstable", as the District is aiming to move towards more equitable language when describing residents neighborhoods.
ANC 2E-19	2.14	LU-2.4.5	Land Use	ANC 2E notes the language changes in Policy LU-2.4.5: Heights and Densities in Regional Centers, §312.8, which would result in the active encouragement of increased heights and densities in the commercial corridor in Georgetown. ANC 2E believes the original language, which calls for maintenance of existing heights and densities should be retained, along with the requirement that new development "step down" to "adjacent residential areas."	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current language adequately describes District policy and positions regarding the heights of buildings.
ANC 2E-20	2.14	LU-3.2.3	Land Use	Revised language in Policy LU-3.2.3: Non-Profits, Private Schools, and Service Organizations, §315.8, would permit expansion of institutional uses that adversely affect neighborhoods if "commensurate benefits" are provided. ANC 2E believes that he proposed changes to §315.8 should not be adopted unless a precise definition of "commensurate benefits" is included.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current language adequately describes District policy and positions related to the utilization of land for these uses.
ANC 2E-21	2.14	812.4	Parks-Rec-Open Space	§812.4 ("Rock Creek Park") speaks to the value of Rock Creek. Reinvestment is needed in key parks along Rock Creek, especially those (like Rose Park in Georgetown) that help connect different neighborhoods by providing foot traffic and potential bike paths. Reinvestment should address the ongoing need for safe walkways, level paved areas, and beautification efforts that take into account need for family friendly safety initiatives. ANC 2E is not persuaded that given all the other priorities within the CP that existing city assets such Rock Creek will receive needed reinvestment. How will the CP prioritize reinvestment?	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Implementation Element for more information on prioritization.
ANC 2E-22	2.14	T-2.6.2	Transportation	ANC 2E believes that Policy T-2.6.2 Transit Needs (§412.3) should include "persons with disabilities" in the list of transit-dependent groups requiring assistance.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; People with disabilities are included in persons whose situations require special services.
ANC 2E-23	2.14	T-5.1.4	Transportation	In new Policy T-5.1.4: Equitable Access, ANC 2E believes it should be made clear that vehicle fleets will be required to be made accessible to people with disabilities.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current guidance is consistent with existing District policy. The policy references equity of access to all users.

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ANC 2E-24	2.14		001 - General Comp Plan Comments	<p>ANC 2E has been asked to comment upon roughly 1,500 pages of proposed amendments to the District Elements of the 2006 Comprehensive Plan for the National Capital. The Office of Planning, the author of the proposed amendments, tells us "the changes are substantive and constitute a major revision" to the Comprehensive Plan. ANC 2E believes the Office of Planning has understated the scope of the proposed amendments. What ANC 2E has been asked to review is much more than a "major revision"; it can fairly be described as a completely new plan that has been prepared without the robust process of community engagement that led to the adoption of the 2006 plan.</p> <p>ANC 2E will comment in detail upon the proposed amendments after receiving and considering comments from residents at a public meeting to be held on February 12, 2020, but as a preliminary matter, we comment now on a theme running through the proposed amendments that ANC 2E finds concerning. Many of the language changes proposed by the Office of Planning appear to be designed to give the Office of Planning more discretion in making decisions or in giving advice to other District agencies on issues that affect neighborhoods throughout the city. An example of this grant of expanded power is the simple change of a few words. Where the 2006 plan used words like "protect" and "preserve" when referring to neighborhoods, neighborhood character, and historic resources, the proposed amendments would delete those words and replace them with "respect." The change may be subtle but it is very important. If the proposed amendments are adopted, the Office of Planning and other District agencies would no longer be directed to protect neighborhoods throughout the city. Instead, the agencies would be given the discretion to approve actions that could negatively affect a neighborhood as long as the neighborhood is "respected."</p> <p>That is but one example but it illustrates the point. ANC 2E is concerned that the document that is now before us is in reality a new Comprehensive Plan that has been produced by the Office of Planning without the active community and engagement that preceded adoption of the 2006 Comprehensive Plan. To quote from that plan, isn't it time for residents of Washington to participate in "an in-depth analysis of existing conditions and trends, and a fresh look at the City's future"? ANC 2E urges the Mayor and the Council of the District of Columbia to defer action on the proposed amendments and to instead initiate a robust campaign of public engagement, including the formation of a Plan Revision Task Force, or a similar body made up of members who represent a broad cross-section of the residents of our city with the goal of preparing an entirely new Comprehensive Plan.</p>	03-Acknowledged	<p>Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; In October 2019, OP launched the final public review process, and took several steps to prioritize meaningful ANC participation, including holding trainings about the process and timeline; hosting ANC-specific trainings about key changes; and attending ANC meetings. As a result, OP received 33 official ANC resolutions.</p> <p>The public review process for the draft Comprehensive Plan update illustrates how OP has balanced our commitment to robust public engagement with the urgent need to deliver the proposal to the Council in time to allow for the Council to approve it before the end of 2020. Upon the draft update's release, OP heard from many residents, ANCs, and stakeholders who support moving the process to adopt the Comprehensive Plan forward with all deliberate speed, because they desire to see their input reflected in an updated,</p>
ANC 2E-25	2.14	CSF-1.1.6	Community Services and Facilities	<p>In Policy CSF-1.1.6 Barrier-Free Design, ANC 2E believe that planning to "consider Universal Design Solution when opportunities present themselves and as funding allows" is setting the bar extremely low for inclusion and respect of residents with disabilities. ANC 2E asks OP to revisit this issue and to require Universal Design Solution.</p>	03-Acknowledged	<p>Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; District facilities are designed to meet access guidelines of the Americans With Disabilities Act.</p>
ANC 2E-26	2.14		Education Facilities	<p>The CP appears to mention overcrowding as a minor issue, yet this issue is frequently brought up at ANC 2E public meetings and other local events. Current efforts to combat overcrowding will be exacerbated given that the CP calls for the building of an additional 35,000 housing units. ANC 2E asks OP to confirm in the CP that the housing, educational plans and parks and recreation plans are well aligned with regard to population growth.</p>	03-Acknowledged	<p>Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The master facilities planning process described in EDU 1.1.1 is listed as the top policy because it is the vehicle where schools facility planning and land use planning are aligned. This work is conducted at regular intervals on an ongoing basis.</p>

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ANC 2E-27	2.14	LU-1.1	Land Use	In §304.2 (under LU-1.1 "Strengthening The Core"), the current Plan mandates that "growth must be accommodated in a way that protects the . . . historic texture" of areas in which growth is occurring. In the CP the word "protects" is replaced by "respects." This substitution of "respects" for "protects" or "preserves" in reference to neighborhoods and neighborhood character recurs throughout the CP. ANC 2E is concerned that deleting the requirement that neighborhoods be protected, and replacing it with a mere suggestion that neighborhoods need only be honored, could lead to the loss of neighborhood stability, the protection of which was a principal goal of the 2006 Comprehensive Plan.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Phrases like "protect neighborhood character," which has been documented to have been used to perpetuate racial exclusion and segregation, has been replaced with "respect neighborhood character" to reframe this important objective using an inclusive tone.
ANC 2E-28	2.14	T-1.1.1	Transportation	ANC 2E notes that Policy T-1.1.1: Transportation Impact Assessment, found in §403.7 of the Transportation Element of the CP would delete the requirement that "full environmental impact statements" be prepared for major transportation projects. ANC 2E opposes this change.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; There are existing legal requirements for environmental impact statements.
ANC 2E-29	2.14	1408.2	Arts and Culture	ANC 2E does not understand why the language in §1408.2 promoting support for creative professionals was deleted. Georgetown, for example, would benefit from this type of work force focus. ANC 2E encourages the OP to consider places in DC where the creative workforce can be encouraged to grow and thrive.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Growth of creative industries and their workforces is now focused in the Economic Development Element's Supporting Innovation in the Economy section.
ANC 2E-30	2.14		Community Services and Facilities	This chapter of the CP should include a goal of reducing the number of Long-Term Care Facilities in the District and replacing them with more robust Community Based Services for people with disabilities and the elderly.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Revised Policy CSF 2.39: Improving Access to Long-Term Supports and Services for Vulnerable Populations and Action CSF 2.3.D Improving Coordination and Service Delivery among District Agencies covers this topic.
ANC 2E-31	2.14		Community Services and Facilities	ANC 2E is concerned that taken as a whole the Community Service and Facilities Element fails to address many issues important to residents with disabilities.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Revised Policy CSF 2.39: Improving Access to Long-Term Supports and Services for Vulnerable Populations and Action CSF 2.3.D Improving Coordination and Service Delivery among District Agencies covers this topic.
ANC 2E-32	2.14	H-1.1.4	Housing	The CP is replete with references to the city's goal of promoting the development of affordable housing throughout all neighborhoods. Not surprisingly, the Housing Element contains many proposed amendments intended to support this goal. In particular, ANC 2E notes the proposed amendments to Policy H-1.1.4: Mixed Use Development (§503.5) that would call for the promotion of "moderate to high density" mixed use development that includes affordable housing on commercially zoned land, particularly in neighborhood commercial centers, along Main Street mixed use corridors and high capacity surface transit corridors. ANC 2E asks OP to clarify whether this policy is intended to apply to commercial corridors in the Old Georgetown historic district.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; M Street and Wisconsin Avenue NW is considered a high capacity surface transit corridor.

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ANC 2E-33	2.14		Near Northwest	Alternative Transportation: The modes of transportation in DC are quickly changing to meet new demand, reduce pollution, and improve traffic flow. ANC 2E supports the overall concepts in MoveDC and the concept of embracing non-auto options. ANC 2E also supports efforts to improve city infrastructure for bikes, multi-modal forms of transportation and pedestrians and Vision Zero. However, in just a few years over 10,000 alternative vehicles have been authorized by DDOT to operate on city streets, and thousands more are expected. These numbers do not account for the increase in the home package delivery vehicles. How the city aims to integrate these new modes into DC neighborhoods is very unclear. Our neighborhood has repeatedly shared concerns and ideas about safety and enforcement issues, and yet we are not being heard or responded to by DDOT. The alternative transportation efforts appear to be operating without any accountability to the residents of Washington or the unique challenges (e.g. sidewalk widths, paving materials, etc.) they face. More in-depth planning is needed on how these alternative modes will integrate with and impact our city – and DDOT must develop a way to seek consideration and respond to regular input from ANCs on these evolving issues given safety and enforcement concerns. 1 Non-single owner vehicles such as Uber and Lyft people delivery cars, motorized scooters, dockless bikes, mo-peds, temporary rental cars, etc.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See NEW Policy T-2.1.6: First – Last Mile Connections; NEW Policy T-2.2.7: Transportation Network Companies (TNCs); NEW Policy T-2.3.6: Dockless Programs; NEW Action T-2.3.E: Dockless Sharing Programs.
ANC 2E-34	2.14	2108.15; 2108.18; 2114.4	Near Northwest	§§2108.15, 2108.18 and 2114.4 (NEW) speak to transit and refer to Georgetown or a street in Georgetown. Yet, none of these sections offer real specifics or state that there will be a robust planning process. Georgetown needs transportation – it is one of the city's major connecting areas, yet the city has not done a thorough analysis in many years of Georgetown's transportation options. Moreover, DDOT has not responded to local input on the implementation of alternative modes of transportation. ANC 2E requests that the CP place a priority on transportation options for Georgetown. Any transit on K street should be pedestrian friendly and encourage foot traffic to other areas of Georgetown. The current plan for K street is outdated. Moreover, further consideration should be given to the feasibility of a metro stop in Georgetown. Finally, DDOT should seek local feedback on the implementation of alternative modes of transport. ANC 2E asks that the CP state the need for pedestrian-friendly transportation to and from Georgetown and state that the creation of transportation plan for Georgetown should be an immediate goal.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; There are references in the Element (and in the Transportation Element) about the need for better transit connections to and from Georgetown. The details for these improvements will be discussed and developed as projects move forward, and are too detailed for the Comprehensive Plan.
ANC 2E-35	2.14	410.3	Transportation	ANC 2E believes §410.3 should be amended to include reference to the importance of improving accessibility of sidewalks and paths for disabled pedestrians.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The importance of improving sidewalks for the ease of mobility for those with special needs and older adults is covered in subsection T-2.6: Addressing Accessibility for All Residents.
ANC 2E-36	2.14		Arts and Culture	Although ANC 2E agrees with the emphasis on providing theatre for those who live east of the Anacostia river, it should be noted that no major stand-alone theatre exists west of Rock Creek, which also houses a large portion of DC's population. At a minimum, OP should aim to encourage children's theatre in all part of the city given the city's educational goals.	04-No	Current language is sufficient and does not preclude regulatory action; Though areas west of Rock Creek Park might benefit from additional cultural facilities, which are supported by other policies in this element including AC-1.1 Expanding Arts and Cultural Facilities and AC1.2 Art and Culture in Every Community, the barriers and deficits underpinning the referenced policy are not comparable to those facing many communities East of the Anacostia River.
ANC 2E-37	2.14	H-1.1.D	Housing	New Action H.1.1.D: Research New Ways to Expand Housing (§503.10) suggests the Height Act of 1910 could be "updated" to promote housing production. ANC 2E would oppose changes to the Height Act of 1910 that could permit the construction of tall buildings in the Old Georgetown historic district.	04-No	Current language is sufficient and does not preclude regulatory action; Current language does not change the Height Act it simply adds it for study as a potential impediment to housing.

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ANC 2E-38	2.14		Near Northwest	Georgetown and Future Planning Analysis Areas: Georgetown needs a thoughtful Small Area Plan. Georgetown is the oldest part of DC, it is nationally known, and it is an important gateway into our city. With regard to transportation options for Georgetown, the city has decided in the last few months that there will not be investment on K street at this time and the city is proposing to reduce bus lines into and out of Georgetown. These actions are being taken despite the fact Georgetown has never had a metro stop. Georgetown retail is struggling. Vacant commercial buildings are becoming a frequent and concerning sight, so much so that nearly 200 Georgetown residents, business owners and concerned property owners participated in a working group session originated in partnership with the ANC, the Citizens Association of Georgetown, Georgetown BID and Georgetown's Main Streets three months ago to discuss vacancy issues. Telecommunication companies are requesting multiple zoning adjustments, pitting federal and DC policies against each other while leaving local residents no clear path to defend their historic streetscapes. Our public schools have overcrowding after fifth grade and projections show overcrowding will only increase in the coming years. Our infrastructure, like many of the older areas of DC, needs updating, including basic utilities that are needed to serve a growing population. The Generalized Policy Map (GPM) (http://bit.ly/34T2eY1) does not designate Georgetown as a Future Planning Analysis Area. Instead, part of Georgetown is designated as one of the few Regional Centers in DC; however, the intent of the definitional changes made to the Regional Centers is unclear. ANC 2E asks OP to work with our ANC to create a Small Area Plan for Georgetown and to make Georgetown part of the Future Planning Analysis efforts.	04-No	Current language is sufficient and does not preclude regulatory action; See Land Use Element and Generalized Policy Map for Future Planning Analysis Area definition. There are no anticipated land use changes or development pressures that would necessitate a small area plan for Georgetown.
ANC 2E-39	2.14	2108.16	Near Northwest	§2108.16 calls for a market studies in two areas of Near Northwest. Georgetown also needs a market study. ANC 2E requests that such a study be prepared.	04-No	Current language is sufficient and does not preclude regulatory action; Current guidance is consistent with existing District policy and priorities, a market study can be conducted for Georgetown without a reference in the Comp Plan if needed.
ANC 2E-40	2.14	2114	Near Northwest	Section 2114 speaks only to Lower Georgetown. ANC 2E asks the OP why not all of Georgetown was considered for planning purposes? Georgetown as a whole has a range of issues that it needs to address. Goals must be set and met for an integrated future Georgetown (note the above request for a Small Area Plan for Georgetown)	04-No	Current language is sufficient and does not preclude regulatory action; The area of Georgetown in the Comp Plan has been expanded from Georgetown Waterfront to include planning areas like the Canal and Georgetown's connectivity to Foggy Bottom, while the recommendation is intentional to its geography.
ANC 2E-41	2.14	800.5	Parks-Rec-Open Space	ANC 2E urges OP to amend the second bullet in §800.5 ("Overview") to include a requirement that parks and recreational fields will not be changed without robust community outreach and input.	04-No	Current language is sufficient and does not preclude regulatory action; See Parks, Recreation and Open Space Element for information on parks planning.
ANC 2E-42	2.14	PROS-4.1	Parks-Rec-Open Space	In §8.7 ("PROS-4.1 Maximizing Access Through Partnership"), ANC 2E believes §8.17 should be revised to state that public private partnerships can be a positive way to help our parks function, provided that such partnerships do not impede equitable access to the public resource.	04-No	Current language is sufficient and does not preclude regulatory action; The Parks, Recreation and Open Space Element provides guidance on partnership opportunities that does not preclude the ability for public private cooperation in the future.
ANC 2E-43	2.14	1405	Arts and Culture	New section 1405 (AC-2 "Making Culture More Visible") highlights that DPW trucks display artwork created by local artists. ANC 2E encourages OP to expand this program to other vehicles, thus encouraging our local talent by showing them they are valued by our city.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Expanding the funding for displaying local artwork on District vehicles is outside the purview of the Comp Plan.

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ANC 2E-44	2.14		Urban Design	ANC 2E is disturbed by the fact that, taken as a whole, the proposed amendments to the Urban Design Element would (1) reduce the level of design oversight from the Commission of Fine Arts, and other federal agencies, (2) advocate for a virtual evisceration of the Height Act of 1910, (3) restrict the ability of ANCs to participate in design and zoning matters, (4) weaken and generalize historic preservation concepts wherever possible, (5) weaken zoning map classifications and overlays to promote growth regardless of proximity to commercial uses; and (6) encourage penthouses and roof decks. ANC 2E views these changes as disturbing and recommends that such changes not be implemented without robust community and ANC input.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The amendments to the Urban Design Element do not affect the review authority of CFA or ANCs.
ANC 2E-45	2.14		Historic Preservation	ANC 2E believes that one of the goals of the Historic Preservation Element should be increasing efforts to make historic properties accessible for all members of the community, including people with disabilities. Finding accessible solutions to design elements should be a principal goal of this Element.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Accessibility to both historic and non-historic properties is governed by the Americans with Disabilities Act, which is applied through DC construction codes and permit review.
ANC 2E-46	2.14		Near Northwest	Appropriate Representation: For years to come, Ward 2 – which is a massive revenue generator for DC – will be impacted by this CP. Currently, Ward 2 lacks an elected Councilperson. Typically, ANC 2E would look to this individual to ensure Ward 2 opportunities, needs and considerations are aligned in the CP. The final draft CP will be discussed and agreed upon by 13 members of DC Council and the Mayor's office. Several of the "planning boundaries" used in the draft CP are located in Ward 2. Many neighborhoods in Ward 2 will be greatly impacted by the CP, yet there is no Councilperson representing Ward 2 at this time. The residents of every area of DC are specifically represented by an elected Councilperson, except Ward 2. The property, individual income, sales/use, and business income tax from Ward 2 contributes more than 30% of the non-Federal funding used to operate the entire city. Any CP that could impact Ward 2 should be carefully considered by someone with a deep knowledge of and specific interest in Ward 2. ANC 2E calls on the OP to encourage the Mayor and the Council to defer substantive action on the CP until the residents of Ward 2 are represented on the City Council. If the Mayor and OP are not willing to wait until Ward 2 is represented, ANC 2E recommends a process change. The Mayor should identify a person who will be devoted to summarizing - in writing - the comments submitted by entities and residents in Ward 2 as well as comments from other parts of the city could potentially impact Ward 2. This individual and their written summaries should be made available to ANCs and the Council members. The individual can be a seasoned employee from the OP, if appropriate.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The recommendation is outside the scope of Comp Plan. The elected ANC officials, At-Large Council Members, and Mayor may serve as elected representatives to lobby and advocate for Ward 2 stakeholders in the brief absence of the Ward 2 Councilmember, should the Comp Plan legislation be introduced and/or acted upon prior to the special election for the Ward 2 Council Member seat.
ANC 2E-47	2.14		Near Northwest	Prioritization: The CP is an ambitious plan for a growing city. That said, the most critical CP goals should be more clearly identified so they are not lost in the massive size of the document. ANC 2E recommends that the OP state which priorities are the top issues. We assume upcoming city budget discussions will be aligned with the CP's most critical goals.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Framework Document, which has already been adopted by Council, provides guidance on the priority goals for the Comprehensive Plan.
ANC 2E-48	2.14		Near Northwest	Balancing Affordability, Preservation and Community Input: One goal that is clearly set out in the CP is a substantial increase in the availability of affordable housing throughout the city. ANC 2E fully supports this goal. This said, various language choices in the CP could be interpreted to mean that the OP believes the only way to achieve the goal is to both compromise the stability of neighborhoods throughout the city and significantly reduce the role of community input. ANC 2E finds this troublesome. As noted in our comments, ANC 2E asks that the OP clarify its intentions for changing existing development/building/zoning processes, especially around reducing the requirement for community input.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comprehensive Plan does not minimize the importance of community input in the planning or development process. It articulates District wide goals development should help achieve. See Framework Element for Guiding Principles and Implementation Element for Community Input.
ANC 2E-49	2.14		Near Northwest	Monitoring, Evaluating and Amending the Comprehensive Plan: ANC 2E urges the OP to ensure it seeks robust input from the ANCs on status of CP implementation. Currently the OP currently is only required to "publicize" its progress reports.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; See Implementation Element and ANC statutory language in DC Code.

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ANC 2E-50	2.14		Parks-Rec-Open Space	Chapter 8 of the CP is critical to residents young and old. DPR is going through significant transformation and now manages over 700 parks. DPR lacks an electronic maintenance tracking tool for its parks. Without such a tool, users, including ANCs, cannot work with DPR to track the status of basic maintenance/safety requests, as well as beautification opportunities. Although new language under old §808.4 "DC Speaks Out on Parks" notes that deferred DPR maintenance is an issue and §810.16 (Action PROS-2.2.B: Maintenance Standards) notes the need for a maintenance standard for sustainability, Chapter 800 should also include a goal for DPR to electronically track and report on maintenance needs so that accountability on deferred maintenance is possible. To address the long-standing issue of deferred DPR maintenance, ANC 2E asks that a goal be set for DPR to implement a maintenance tracking technology that is visible to interested parties, such as Friends Groups and ANCs who are investing time, money and energy into our parks. The timeframe for this should be short-term so that budgeting will not be a barrier to successful execution.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; See Parks, Recreation and Open Space Element for additional guidance on District Parks.
ANC 2E-51	2.14	T-1.1.A; T-1.1.B	Transportation	Actions T-1.1.A: Transportation Measures of Effectiveness and Action T-1.1.B: Transportation Improvements (§§403.13 and 403.14) speak to transportation measures of effectiveness and coordination. Currently, DDOT is only accountable for issuing measures, considering improvements and meeting with neighborhood jurisdictions. It is unclear if OP or DDOT view feedback from ANCs on non-auto transportation as a key piece of feedback or if it will be accorded great weight. ANC 2E believes OP should make it clear what the CP requires of MoveDC or other similar programs (and the role of ANC's in this process) given that so much of the CP is dependent upon the successful roll-out of MoveDC.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comprehensive Plan does not regulate other agencies planning documents. moveDC is DDOT's Long Range Transportation Plan and was developed with community input.
ANC 2E-52	2.14	T-2.3; T-2.4	Transportation	In sections 409 "T-2.3 Bicycle Access, Facilities, and Safety" and 410 "T-2.4 Pedestrian Access, Facilities and Safety," ANC 2E recommends stronger language that calls for monitoring and enforcing the private vendor/providers dockless programs' Agreements (B23-359 – The Electric Mobility Devices Amendment Act of 2019). Currently, DDOT does not effectively monitor or enforce the Dockless Bike and Scooter Share Terms and Conditions. The dockless programs need to be administered with the interests of all DC residents in mind, not only the interests of users of such means of transportation. Since the dockless vehicle program began, multiple neighbors in various Wards have observed that DDOT has not been effective in implementing awareness, education, safety and enforcement. Moreover, all available data on the program is extremely high-level, thus little analysis can be done by neighborhoods using DDOT-developed data. More data should be made available to ANC's and OP should revise §409.10 to specifically call out the need to address the safety, monitoring and enforcement of this alternative modes.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Regulation of scooters and dockless providers is DDOT's responsibility, their program has developed incentives and repercussions for not following their standards.
ANC 2E-53	2.14	411.1	Transportation	In section 411 "Roadway System and Auto Movement," §411.1 notes that 22% of the District's intersections are signalized. The CP should include a goal providing signalization appropriate for blind residents at these intersections.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; ADA treatments for signals are already legally required.