



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 2F
5 Thomas Circle NW
Washington DC 20005

RE: Advisory Neighborhood Commission 2F Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Fanning, Forman, Guggenmos, Bottino, Stirling, Simon, Sylvester, and Ferbee:

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 2F, 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 2F 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. For example, the ANC’s recommendation to examine tax and other incentives for small cultural facilities is acknowledged and addressed in the Arts and Cultural Element Action, AC 4.1.B.

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.

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 2F-1	2.13	1608.15	Central Washington	1608.15: CW – 1.1.14: Central Washington Multi-Modal Transportation System <ul style="list-style-type: none"> We agree that “Mass transit, walking and biking should be supported as the dominant forms of transportation to, from, and around the area.” Studies show that e-scooters replace walking and biking. Furthermore, a growing body of research suggests that the scooter craze may not be as green as advertised. Education and enforcement are needed to implement the prohibition of riding on the sidewalks in the Central Business District, in accordance with District law. 	02-Support. No integration needed.	Thank you for your support.
ANC 2F-2	2.13	1608.16	Central Washington	We support Improved/increased protected bike lanes, and the maintenance and implementation of dedicated bus lanes (H & I Transitway and upcoming K Street Transitway).	02-Support. No integration needed.	Thank you for your support.
ANC 2F-3	2.13	9810 and 9938	FLUM	We encourage development of underutilized sites within ANC 2F’s boundaries to provide more housing, including affordable housing, and support the following amendments proposed by OP to the Future Land Use Map (FLUM) and Generalized Policy Map (GPM): <ul style="list-style-type: none"> - FLUM amendment 9810 to change 11th Street NW from M Street to O Street from moderate density commercial, moderate density residential to moderate density commercial, medium density residential. Eleventh Street NW is a wide, transit-oriented corridor that can comfortably accommodate future growth, and the increased residential density is appropriate in order to meet housing goals. - FLUM amendment 9938 to change 11th Street NW from O Street to R Street from moderate density residential to moderate density commercial, moderate density residential. This change is consistent with existing land uses and zoning. 	02-Support. No integration needed.	Thank you for your support.
ANC 2F-4	2.13	9965	Generalized Policy Map	We encourage development of underutilized sites within ANC 2F’s boundaries to provide more housing, including affordable housing, and support the following amendments proposed by OP to the Future Land Use Map (FLUM) and Generalized Policy Map (GPM): <ul style="list-style-type: none"> - GPM amendment 9965 to change one block of 14th Street NW between Riggs Street NW and S Street NW from a Neighborhood Conservation Area to a Main Street Mixed-Use corridor. This proposal is consistent with the mixed-use nature of the Uptown Arts-Mixed Use Overlay District (ARTS-3) surrounding this block and would allow better utilization of land. 	02-Support. No integration needed.	Thank you for your support.
ANC 2F-5	2.13	2109.12	Near Northwest	ANC 2F supports plans to develop additional recreational centers within the Planning Area, with a priority on the Logan Circle and Foggy Bottom-West End areas. The 2006 Parks and Recreation Master Plan identified these areas as being the parts of Near Northwest that are most deficient in recreational centers. We expect the Shaw Dog Park to continue or be relocated in the Logan Circle and Shaw neighborhoods.	02-Support. No integration needed.	Thank you for your support.
ANC 2F-6	2.13		Transportation	ANC 2F supports OP’s overall plans for moveDC, the Multimodal Long-Range Transportation Plan for transportation infrastructure and policies that guide DC’s transportation vision for the next two decades. We support all efforts to build or upgrade the pedestrian and bicycle infrastructure (increase bicycle safety through continued expansion of protected bike lanes/cycle tracks and other separated facilities (409.10), and to create and implement effective and more extensive awareness, education, safety and enforcement campaigns for bikes, e-scooters and other micro-mobility vehicles, in accordance with the District’s laws. E-scooters have become a public safety hazard due to lack of education and rules enforcement, and disregard for pedestrians, the elderly and those with disabilities (fallen e-scooters and speeding on sidewalks past pedestrians).	02-Support. No integration needed.	Thank you for your support.
ANC 2F-7	2.13		001 - General Comp Plan Comments	The Draft Comprehensive Plan (CP) lacks a prioritization of recommendations. In order to be useful to the Council of the District of Columbia as a guide for immediate/medium-term/long-term action, the Office of Planning (OP) should amend the existing draft and include the three top priorities for each chapter and the five top priorities for the CP as a whole.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comprehensive Plan provides overall policy guidance for a wide range of issues, and does not priorities policy issues over others.

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ANC 2F-8	2.13	1403.1	Arts and Culture	The plan recognizes that sustaining space for arts and cultural uses is threatened by high real estate values and refers to a collaborative approach that includes "leveraged funding and financing for facility maintenance, development and programming," but provides no specifics.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See the Arts and Culture Element, Action AC-4.1.B: New Sources of Cultural Funding for more guidance.
ANC 2F-9	2.13	AC-1.1.10	Arts and Culture	<ul style="list-style-type: none"> • We agree that developing low-cost cultural space should be provided in addition to, not instead of, any affordable housing deemed appropriate for a PUD. • We recommend examining tax and other incentives for small cultural facilities and businesses to retain existing ones and to encourage establishment of new ones. □ 	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Arts and Culture Element, Action AC-4.1.B: New Sources of Cultural Funding for more guidance.
ANC 2F-10	2.13	500.2	Housing	<ol style="list-style-type: none"> 1. \$100 million per year for the Housing Production Trust Fund is likely not enough to meet the goals of this plan. This should be studied and demonstrated further. 2. Increasing density throughout the city as matter-of-right without additional regulatory and approval processes is the fastest way to reach housing targets. 	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Amendments to the Future Land Use Map support increasing density.
ANC 2F-11	2.13	503.6	Housing	What is the mechanism for "requiring the design of affordable and accessible housing to meet or exceed the same high-quality architectural standards achieved by market-rate housing...."? While this is a lofty goal, affordable housing must be produced at lower cost (or with higher subsidies) in order to deliver it for lower rents or sales prices. If this requirement adds additional design review and/or construction cost, this could add time and cost to the project, or make it impossible or more difficult to achieve.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current guidance is consistent with existing District policy on architectural design and equity.
ANC 2F-12	2.13	506.8	Housing	In addition to assisting residents of public housing to become homeowners, consideration must be given to whether their incomes are adequate to maintain their homes over time.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current guidance is consistent with existing District policy, which supports the ability of residents to be homeowners.
ANC 2F-13	2.13	506.11	Housing	Acquiring small sites at market rates is likely to be very expensive and time-consuming.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current guidance is consistent with existing District policy and is one of many tools targeted to provide opportunities for affordable housing.
ANC 2F-14	2.13	507.1	Housing	The lengthy time and cost of approvals and permitting processes, and associated community engagement/backlash and litigation, have been demonstrated to be a barrier to producing housing units at the rate we need, including affordable units. Developers are opting to develop projects as matter-of-right to avoid these processes, leaving higher density on the table. Clarity and predictability in the interpretation of the CP and zoning regulations by officials are critical to housing production.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Framework Element and H-1.5.1 address land regulations and zoning regulations.

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ANC 2F-15	2.13	507.2	Housing	<p>1. The Urban Land Institute's 2019 report, Increasing Housing Supply and Attainability: Improving Rules & Engagement to Build More Housing, found that special density entitlement processes (PUDs, Board of Zoning Adjustment relief, etc.) take about two years and \$2-2,500,000, regardless of the size of the project or number of units. This burden adds cost to housing production and can cause projects to miss the market cycle, and/or prevent projects from going ahead altogether, especially smaller developments. Regulatory requirements should be scaled to the size of development projects.</p> <p>2. This is also true of many matter-of-right projects subject to HPRB approval processes, including ANC and community group review and input. With about 30 percent of the city designated as historic, this puts a significant burden on the timing, cost and quantity of housing production. In some cases, residents demand and HPO/HPRB support the reduction of density from the matter-of-right zoning under the concept of maintaining "neighborhood character." Specificity on what constitutes neighborhood character would be useful and zoning should conform to defined neighborhood character to remove ambiguity and controversy.</p> <p>3. All these processes need to be quicker, less costly and more predictable. The Urban Land Institute suggested that OP work directly with neighborhoods to create Small Area Plans that incorporate community needs and input up front, which can then be implemented by the development community as matter-of-right on a project-by-project basis.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comprehensive Plan speaks to the need to add additional housing capacity in the District, tools are being developed to achieve the Mayors goal of addition 36,000 additional units by 2025 which may address these issues.
ANC 2F-16	2.13		Housing	<p>The targeted distribution of affordable housing units appears reasonable at 33 percent affordable and 67 percent above 80 percent of the area median family income (MFI). However, building 30,000 units by 2025 and setting goals for each Ward require OP to test where and how many units can be built – and how fast. Merely requiring more affordable units by inclusionary zoning (IZ) or other regulations will not necessarily result in building more units. Developments are funded by banks and other investors who provide 75 to 90 percent of the funds and require a specific ROI. If that ROI cannot be achieved due to increased costs imposed by procedural delays and regulations, investments will go to other uses or other jurisdictions in the region.</p> <p>1. IZ has limits without increasing density or reducing costs of the approval process.</p> <p>2. Tying density bonuses to "neighborhood character" encourages community backlash, unless neighborhood character is specifically defined, and matter of right density is calibrated to be in harmony with neighborhood character.</p> <p>3. Reducing offsite housing contributions in favor of building affordable units onsite is a good goal, if it does not penalize small or difficult sites.</p> <p>4. Make the process to obtain tax credits and other funding from city sources easier, faster and less costly for commitments to build affordable units.</p> <p>5. Explore rent-to-own financing structures that benefit both the developer and resident.</p> <p>6. Preserving single-family row houses and homes will not necessarily lead to affordable family housing. They could just become expensive townhouses and homes. It would be more effective to increase zoning on existing lots where possible to allow expansion, ADUs in backyards, or infill development. OP's Neighborhood Planning Division should determine where this is possible by neighborhood based on a zoning review.</p> <p>7. Tax vacant land and structures at very high rates to encourage sale or development and inspect premises for which building permits have been issued to verify actual construction/repair activity is occurring.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is intended as a high-level guiding document. Each development project's financing structure, partnerships, and regulations are reviewed on a project by project basis. See LU-Section 307 - NEIGHBORHOOD INFILL DEVELOPMENT, UD Policy UD-1.1.7: Community Life in Alleys, and Housing Section H-1.3 Diversity of Housing Type for policies around accessory dwelling units.

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ANC 2F-17	2.13	504.8	Housing	<p>1. Significant community engagement by DC Government will be needed for this policy goal. If communities are permitted to chip away at zoning densities or mount legal opposition, this could actually reduce the amount of housing built in high cost areas. This burden should not be placed only upon the real estate development community, site by site.</p> <p>2. Small Area Plans may be a way to set expectations and engage neighborhoods in this effort.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See the Housing Framework for Equity and Growth and corresponding reports from the Office of Planning, the Department for Housing and Community Development, and the Deputy Mayor for Planning and Economic Development. Additionally, the Generalized Policy Map identifies a number of future planning analysis areas to further support these efforts.
ANC 2F-18	2.13		Land Use	<p>The draft amendments to the CP should devote considerably more attention to moving projects through the system more quickly if housing goals are to be met. Special density Planned Unit Developments (PUDs) and Historic Preservation Review Board (HPRB) approvals take too much time, involve too many people with competing desires, and cost too much money to produce the housing we need in the anticipated time frame.</p> <p>1. Streamline (faster, cheaper) all permit and approval processes.</p> <p>2. For PUDs and projects in historic districts, limit the time frames for review by the Zoning Commission and HPRB respectively.</p> <p>3. When multiple DC agencies are involved in project approvals, such as the District Department of Transportation (DDOT), the Public Space Committee, the Department of Consumer and Regulatory Affairs (DCRA) or OP, hold interagency meetings and designate a lead agency and official to resolve differences of opinion.</p> <p>4. Consider creating a Fast Track process for moving prioritized housing projects through agency, Board and Commission approval and permit processes to create incentives for affordable and family-sized rental housing.</p> <p>5. OP's Neighborhood Planning Division should create additional Small Area Plans to identify community needs and desires on a larger neighborhood scale, make community benefits predictable and move away from project-by-project, localized negotiations.</p> <p>6. For PUDs, OP should enable the Zoning Commission to simplify the approval process by scaling the cost of providing community benefits relative to the size and cost of the proposed development. Consider reducing community benefit costs for projects with increased affordable housing units.</p> <p>7. OP should create a Task Force to conform zoning to what the Historic Preservation Office (HPO) determines is the appropriate height and density for the neighborhood character in historic districts so that housing can be built as a matter of right and predictability improved, while reducing community backlash. HPO's mandate should include consideration of ways in which good architectural design could enable increasing height and density for existing structures.</p> <p>8. We also recommend that ANC regulations be revised to require all community groups and organizations to present their concerns through the ANC process, thus allowing the ANC Commissioners to weigh community views against the merits of a proposed project and reach conclusions to be reflected in the ANC's report to the HPRB.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comp Plan is a high-level guiding document and does not address operational, budgetary, or regulatory issues.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 2F-19	2.13	1608.19	Central Washington	We support adding "Enhance North-South connections such as the two-way 9th Street Bike Lanes which are under consideration. Request more detail from DDOT about how this issue will affect community members before a final decision is made."	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan supports bicycle connectivity but does not dictate how new facilities are implemented. For information on implementation see moveDC.
ANC 2F-20	2.13		Housing	<p>We support the CP's goal to create 36,000 new housing units by 2025, including 12,000 affordable units, noting the urgency of increasing the supply of housing available for all types of households to reduce our city's burdensome high housing costs. To reach this goal there are several changes that must be made to zoning regulations, the approval processes, and the forms of community engagement.</p> <p>Considering the restrictions imposed by the U.S. Congress in the Height of Buildings Act of 1910, as amended, and the high costs of land in the District of Columbia, we regard it as essential to reaching the new housing goals that zoning and historic preservation regulations reflect the necessity to increase the height and density of new construction wherever possible. We support up-zoning along wide avenues now dominated by row houses where the width of the roadways would allow enough light and air circulation if building heights were eventually increased, for example Rhode Island Avenue NW and NE. Where lot sizes permit in single-family zones, we urge up-zoning to allow more than one residence in addition to the currently allowed accessory dwelling units (ADUs). We note that the vague concept of "neighborhood character" in the CP and regulations could pose significant obstacles to achieving housing goals because of differences in interpretation, delaying permit approvals and allowing opponents of housing development to file obstructive lawsuits.</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Density changes, Accessory Apartments, and language regarding density and neighborhood character are addressed in the Framework, Land Use, Housing, and Urban Design Elements as well as the Future Land Use Map. See LU-Section 307 - NEIGHBORHOOD INFILL DEVELOPMENT, UD Policy UD-1.1.7: Community Life in Alleys, and Housing Section H-1.3 Diversity of Housing Type for policies around accessory dwelling units.
ANC 2F-21	2.13		Housing	<p>Three-bedroom and larger units are not being built because the cost of the square footage is too high to construct relative to rental returns. Developers cannot afford to build them, and families cannot afford the additional space. Merely requiring larger units will not necessarily lead to more units being built.</p> <ol style="list-style-type: none"> 1. Large units will need to be subsidized and/or incentivized to provide developers with an adequate return on investment (ROI). 2. Encourage design of compact units to accommodate more people in smaller, more efficient spaces, providing shared amenities, and indoor and outdoor play space. 3. An additional one-half floor height would accommodate loft space and additional storage, creating a feeling of more space. 4. Encourage "Missing Middle" housing types, such as cluster housing on transitional lots. 5. Encourage mid-rise, multi-family mixed-use developments for communities of families with shared amenities, including Day Care, storefront medical services, retail, etc., that make life easier for families and create community. 	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Family housing is addressed in H-1.3.1 and small infill sites addressed in LU -1.4.4 and FLUM changes to moderate density.
ANC 2F-22	2.13		Housing	<p>DC has several programs that may not be well-known that could be expanded or improved in order to increase home ownership. These need to be marketed more widely where applicable.</p> <ol style="list-style-type: none"> 1. Make programs more widely known, understood and easier to implement. 2. Programs that reduce mortgage down payment requirements can help those with income to support a mortgage but with little or no savings. 3. Consider programs targeted toward families of all income levels, on a sliding income scale. 	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; H-3.1.A covers the Home Purchase Assistance Program. Language does not preclude regulatory action.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 2F-23	2.13		Housing	<p>Retaining and maintaining existing housing is more cost effective and quicker than building new, and it is also more sustainable. However, rising costs of labor and construction materials affect both renovations and new construction. Many of the programs listed in the draft CP amendments sound positive but require funding. How does the city intend to pay for this?</p> <ol style="list-style-type: none"> 1. Expanded apprenticeship programs and Job training for construction trades in collaboration with the building trades unions would be helpful to residents and to the construction industry and could mitigate rising costs, if other regulations do not add barriers. 2. Enforce existing laws to require maintenance of properties, especially rent-controlled property. DCRA needs to hire more building inspectors. 3. Data collection and enforcement of who lives in rent-controlled units are critical. 4. Evaluation of the rent voucher program and provision of wrap-around services to the formerly homeless and low-income tenants are critical to success in mixed-income buildings and neighborhoods. 	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; ED-4.2.5 and ED-4.2.11 addresses apprenticeship programs. Current language does not preclude regulatory action for other items.
ANC 2F-24	2.13	503.2	Housing	<p>Requiring the private sector to provide new market rate and affordable housing could potentially reduce housing supply altogether, depending upon whether the benefits outweigh the additional cost, time and effort. Requirements must be paired with incentives.</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; H-1.2.7 and H-1.2.J address pairing sufficient incentives for affordable housing.
ANC 2F-25	2.13	506.15	Housing	<p>Housing for very low income, homeless and special needs requires wrap around services to be successful. Communities need to see successful programs in order to accept these residents into their community. How does DC Government plan to administer, manage and pay for this? Preparing low income residents for mixed-income living is critical to the success of the program and gaining public support. How will this be done and how will it be monitored – and at what cost?</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Policy H-4.1.1 and H-4.2.2 covers the need for permanent supportive services and successful integration.
ANC 2F-26	2.13	506.16	Housing	<ol style="list-style-type: none"> 1. This section contemplates tax abatements for conversion of office space to residential use. However, in recent years, residential has outpaced office for financial returns in many locations around the city due to the changes in the demand for housing, the nature of work, reduction of square feet/person in offices and increased office vacancy rates. It would better to evaluate this by neighborhood/area and to do so on an annual basis, along with other benchmarking in this plan. 2. Zoning that favors residential Floor Area Ratio (FAR) over office can also create neighborhoods that have insufficient foot traffic during the day, putting further stress on retail corridors that need daytime customers to survive. Favoring office over residential creates dead space at night. 3. Active retail and restaurant/entertainment neighborhoods and corridors with residential preference, such as the 14th Street NW Main Streets corridor, will rely on bars and alcohol sales, creating tension with residents. It is better to have a mix of residential and office to balance day and night traffic to help diverse types of retail thrive. In these cases, FAR should be use-neutral to allow for mixed-use development that flows with the market. 	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; LU-1.1.5 as well as H-1.1.4 and H-1.1.6 support mixed use buildings and neighborhoods.
ANC 2F-27	2.13	510.2	Housing	<p>Consider whether it would be more effective to subsidize low income older homeowners to move to quality senior housing where services are available, thereby allowing larger homes that are not accessible to turn over to low income families who need more space. This may require up-zoning to allow mid-rise multi-family construction in neighborhoods where older adults are currently living.</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; H-4.3.3 addresses providing new housing for older adults.

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ANC 2F-28	2.13	516	Housing	<p>1. Some homeless individuals choose to live on the streets (even in winter) rather than go to the current shelters, citing their location far from non-governmental service providers and the Central Business District. What can be done to better integrate these services?</p> <p>2. Study and evaluate the effectiveness of the Homeward DC program in rehousing families. What happens to families in the program after the end of the year of subsidized rents?</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; H-4.1.1 which discusses supportive services, and H-4.2.3 which discusses increasing supportive housing supply address this comment.
ANC 2F-29	2.13		Housing	<p>The Government of the District of Columbia claims to own enough land to provide adequate housing but needs to find ways to make sure housing development on DC property is affordable. Requiring that 20 to 30 percent of the housing units developed on city-owned land be affordable could necessitate transferring the land at zero cost or providing a subsidy to offset the loss of rental income. A communications strategy should be prepared to educate the media and public about the financial constraints to avoid controversies and opposition about "giveaways" to developers.</p> <p>1. Requests for Proposals (RFPs) for land offered by DC should occur on a defined schedule and have predictable timing for selection of the developer and execution of contracts to build trust in the process. The entire process should be transparent and free of political influence.</p> <p>2. The Consolidated Plan for Housing and Community Development should consider RFPs and contracts for multiple simultaneous or sequential sites for development of affordable housing to increase the economies of scale and reduce construction costs. Repeat unit designs on multiple sites, while also offering varied architectural design by using kits of parts with variations. Consider modular component and/or modular unit construction in this context.</p> <p>3. Reduce the number of multiple parties (developers, consultants, contractors) involved in the development of projects to avoid duplicate management, services and fees. Reconsider submission requirements for Department of Housing and Community Development (DHCD) or other District funding for affordable housing. At present, developers incur the costs of Schematic Design-level drawings for submission without any assurance of future funding. These costs can be transferred to professional service providers such as attorneys, architects and consultants through sharing of risk (without the upside of reward), or even lack of payment after the fact, particularly if funding is not approved. As these professionals are not in the risk business, many qualified firms choose not to do this kind of work. A process based on Requests for Qualifications (RFQ)s with highly defined contractual obligations and scope of work could be adopted, and once funds are approved, the applicant would move to drawing submissions.</p>	04-No	Current language is sufficient and does not preclude regulatory action; Current guidance is consistent with existing District policy. The recommendation is outside the scope of the Comp Plan which is a high-level guiding document. Please see the Housing Framework for Equity and Growth for more information on Housing Development.
ANC 2F-30	2.13	1403.3	Arts and Culture	"Encourage cultural facilities and publicly accessible cultural space in reuse plans for transit station areas" lacks specificity as to how this should be accomplished. Reference to existing programs should be made, such as grants, tax incentives, or other means, and whether existing programs and funding are adequate.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; This language is designed to inform discretionary development and zoning change processes. The District seeks to support these benefits and amenities through the value of entitlements and flexibility.

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ANC 2F-31	2.13	500.12	Housing	IZ for small projects may deter development of infill sites. Consider a scale of IZ units based on size of project.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Current guidance on IZ is consistent with existing District policy.
ANC 2F-32	2.13	1608.21	Central Washington	• We support adding signage : NO RIDING ON SIDEWALKS IN CENTRAL BUSINESS DISTRICT, with a map outlining the CBD boundaries.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is intended as a high-level guiding document. DDOT is currently working on city-wide scooter policy which may address this issue.
ANC 2F-33	2.13	610.7	Environmental Protection	<p>"Support locally generated electricity from renewable sources, including both commercial and residential renewable energy projects. "</p> <p>ANC 2F notes the difficulties and delays homeowners in historic districts have experienced in obtaining approval from the HPRB for installation of solar panels on sloped roofs. While we understand the aesthetic concerns of historic preservation officials and historic neighborhood residents about the visual impact of solar panels on mansard and other sloped roofs visible from the street, we believe that this impact can be mitigated by installation of sheaths such as SolarSkin. We recommend creation of a Joint Task Force of the DC Department of Energy & Environment and the HPO to develop clear guidelines and standards that will facilitate the attainment of our renewable energy goals.</p>	04-No	Recommendation is beyond the scope of the Comprehensive Plan; Although the proposed amendment is outside of the scope of the Comp Plan, in December 2019, during Public Review, HPO and DOEE established the Sustainability guide for existing and historic properties.
ANC 2F-34	2.13	509.9	Housing	Care needs to be taken to ensure that residents living in Tenant Opportunity to Purchase (TOPA) units actually meet the low-income requirements of the program. How will this be monitored and enforced?	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is intended as a high-level guiding document. Enforcement is outside of the scope of Comp Plan.
ANC 2F-35	2.13	2108.11	Near Northwest	ANC 2F supports OP's plan to continue to develop and implement programs to improve parking in the commercial districts. We support adding: Provide residents within designated official Residential Parking Permit zones in Near Northwest and Central Washington with accurate information about the eligibility and application process.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is intended as a high-level guiding document. DDOT handles more specific guidance on RPP.
ANC 2F-36	2.13	2111.24	Near Northwest	The former Shaw Junior High School site is being redeveloped for Benjamin Banneker Academic High School. ANC 2F is disappointed that no provision has been proposed to develop a standalone Junior High School for Ward 2. Parents of the growing number of elementary school age children in this area have expressed reluctance to send their children to Cardozo Education Campus in Ward 1 where they would share facilities with high school students. We anticipate needing a new middle school being built in either Ward 1, 2, or 6-- specifically feeding from Garrison Elementary, Seaton Elementary, and John Strong Thomson Elementary.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is intended as a high-level guiding document. DCPS handles more specific guidance on school facilities.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 2F-37	2.13	409.1	Transportation	ANC 2F 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 overall interests of DC residents in mind, not only of users of such means of transportation. This will be a heavy lift due to DDOT's gross failure to require awareness, education, safety and enforcement campaigns when the dockless bike and scooter programs began. A culture of disrespect and hazardous behavior is going to be hard to correct.	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 2F-38	2.13	509.3	Housing	Cultural displacement is in part related to the nature of ground floor retail. Retail is required by zoning in many locations, and is a desired amenity; however, as neighborhoods develop, and rents increase, neighborhood retail is often replaced with chain stores – some welcomed, while others threaten the identity which attracted residents to move there in the first place. Are there models elsewhere of how to maintain "mom and pop" or individual retailers while also adding new chain stores?	04-No	Recommendation is sufficiently covered in another element/policy/action; See Arts & Culture Element for policies around cultural displacement such as Policy AC-1.2.7: Mitigate Cultural Displacement. Also see Economic Development Element Policy ED-3.2.6: Commercial Displacement.