

District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 3/4G  
Northwest Station  
PO Box 6252  
Washington DC 20015

RE: Advisory Neighborhood Commission 3/4G Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Speck, Bradfield, Clayman, Fromboluti, Garfield, Malitz, and Maydak:

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. We commend ANC 3/4G's organization and commitment, particularly in the form of an assigned task force to review draft proposals. The quality of the feedback we received is reflective of this approach and we are grateful for the collaborative discussions we shared.

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 3/4G, 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 3/4G 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 also included a taskforce calling on the: designation of Connecticut Avenue as the Chevy Chase Gateway; creation of a Small Area Plan for the Chevy Chase Gateway; improved livability and vibrancy for the neighborhood; creative affordable housing solutions; and school facility plans to support population growth. The Mayor's Proposal includes a Future Planning Analysis Area for this neighborhood on the Generalized Policy Map based on the Commission's feedback. Following the submission of the Comp Plan to Council, OP will evaluate neighborhood planning initiatives, including Small Area Plans, for neighborhoods across the District. OP will also continue to work towards reaching the District's affordable housing goals and developing a facilities plan that recognizes and plans for the District's population growth.

#### 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](mailto: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](mailto:plandc@dc.gov) email account or through the [resolutions.anc.gov](http://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,



Andrew Trueblood

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3/4G-1	11.25		001 - General Comp Plan Comments	Request for more time	01-Yes	The community public review process was extended for both the community and ANCs resulting in 88 days for the public and 123 days for ANCs. ANC input is being reviewed as great weight and forwarded to DC Council for great weight.
ANC 3/4G-2	2.12		Environmental Protection	<p>ANC 3/4G has a long-standing interest in the effect of street lighting on the health, safety, and well-being of the community. In 2014, the Commission created an LED Alley/Street Light Task Force to better understand the District's plans and to provide a communication channel to the many residents who had expressed interest and concern about proposed new lighting's color and brightness. More recently, the Commission has deferred to the Mayor's Streetlight Advisory Panel and its members to represent our residents' interests.</p> <p>The Commission shares the concerns expressed by Laura Phinizy, our Street Light Task Force Co-Chair and member of the Mayor's Streetlight Advisory Panel (the "Panel"), along with Delores Bushong, the Founder of the DC Streetlight Task Force and a member of the Mayors Streetlight advisory Panel, and Bonnie Garrity of the citywide Streetlight Task Force with the Office of Planning's (OP's) proposed amendments to the Comprehensive Plan's Environmental Protection Element (<a href="http://bit.ly/2UspXG1">http://bit.ly/2UspXG1</a>) as it relates to light pollution. The Commission concurs in the requests made by these members of the Panel and citywide Streetlight Task Force for the following changes to the draft amendments.</p> <p>Light pollution warrants its own category in the Environmental Protection Element, just as Controlling Noise (Section E-5.4.3), Managing Hazardous Substances and Materials (Section E-5.4.4) and Reducing Water Pollution (Section E-5.4.2) have dedicated sections. Light pollution is mentioned in Section E-5.4.7, Other Hazards and Pollutants, and Section E-5.4.7.3, but those separated sections overlap and may be confusing. As the Panel members described in their comments, light pollution is a significant problem that should be highlighted in the Comprehensive Plan with a separate section on Controlling Light Pollution.</p> <p>The Commission also joins the Panel members in asking that OP include the following provisions in the Environmental Protection element in a section on Controlling Light Pollution.</p>	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-3	2.12	624.1	Environmental Protection	Light has both beneficial and detrimental impacts on residents in the city. LED lights are the most recent light technology and are highly efficient in providing light using less wattage, which conserves energy and results in a significant cost savings. They also last longer than the incandescent, fluorescent, or high-pressure sodium lights that we have used in the past and require less maintenance. Appropriate lighting provides safety and a sense of security. However, with these benefits come challenges for the city. Excessive lighting affects the general health and well-being of District residents.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-4	2.12	624.2	Environmental Protection	Outdoor lighting often surpasses the boundaries where it was meant to provide illumination. Light pollution can result from the combined illumination from streetlights, public buildings, businesses, and private homes. Excessive light levels at night can be detrimental to health and the enjoyment of a person's property. Where lighting is required or desired, steps can be taken to use energy efficient LED lights to provide the correct amount of lighting for the desired purpose and direct the lighting appropriately. With proper design and installation, warm temperature LED lights can deliver quality lighting that illuminates our streets adequately without negatively impacting health or the environment.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-5	2.12	624.4	Environmental Protection	Action E-4.7.A: Managing Light Pollution. Continue to evaluate light pollution levels to identify possible regulatory and programmatic improvements, including increased education and outreach. Study the possibility of adopting features of the Model Lighting Ordinance endorsed by both the Illuminating Engineering Society and the International Dark Sky Association.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-6	2.12	624.5	Environmental Protection	Action E-4.7.B: Evaluation of Light Pollution. Continue to evaluate the District's light pollution control measures to identify possible regulatory and programmatic improvements, including increased education and outreach on light standards and requirements.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-7	2.12	624.7	Environmental Protection	Action E-4.7.D: Measuring Light Pollution. Require evaluation of light impacts and light exposure when large-scale development is proposed, and when capital improvements and transportation facility changes are proposed.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.

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ANC 3/4G-8	2.12		Generalized Policy Map	The Commission supports OP's proposed changes to the Future Land Use Map that increase the planned density for the Chevy Chase Gateway. The Commission asks, however, that OP include a provision in the Comprehensive Plan that the Zoning Commission may not approve any proposed density changes until completion of a Small Area Plan. The Small Area Plan should be a prerequisite so that new development will be consistent with that Plan.	01-Yes	The Future Planning Analysis Area description was updated on the Generalized Policy Map and in the Land Use Element.
ANC 3/4G-9	2.12		Rock Creek West	To achieve the objectives outlined in the Report, the Commission asks OP to change the Generalized Policy Map (GPM) ( <a href="http://bit.ly/34T2eYI">http://bit.ly/34T2eYI</a> ) to designate the Chevy Chase Gateway as a Future Planning Analysis Area where: anticipated future planning efforts will be undertaken in the nearterm (1-5 years) to analyze land use and policy impacts, mitigate and incorporate anticipated growth, and help inform any significant zoning changes. The process should evaluate current infrastructure and utility capacity against the full build out and projected population growth and include issues most relevant to the community that can be effectively addressed through a neighborhood planning process. <sup>4</sup>	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-10	2.12		Rock Creek West	The Commission urges OP to make these changes to its proposed amendments and to work with this Commission to implement the Chevy Chase Gateway Small Area Plan and the other policy provisions that we propose. The Commission and this community can be effective partners with OP to achieve the Comprehensive Plan's ambitious goals while maintaining and enhancing the livability and vitality of the Chevy Chase Gateway neighborhood.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-11	2.12		Rock Creek West	OP should restore the deleted section in the Rock Creek West Area Element that describes "Development Priorities," including such issues as parking, schools, trees, and recreation facilities (Rock Creek West Area Element at pages 13-17). Residents identified those priorities in 2006, and the Commission's survey of our community demonstrates that they remain important development priorities. Our residents priorities continue to be new development that is compatible with existing buildings, reducing traffic congestion, improving pedestrian safety, expanding commercial and residential parking, addressing overcrowding at public schools, and increasing affordable housing. While these priorities may be discussed elsewhere in the Comprehensive Plan, they continue to be important planning considerations for this community. Failure to consider them expressly in the Rock Creek West Area Element, while simultaneously proposing increased density in the Chevy Chase Gateway, would be imprudent.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3/4G-12	2.12		001 - General Comp Plan Comments	The Commission particularly emphasizes three key elements of the Report: <ul style="list-style-type: none"> <li>• Our community needs more affordable housing that will promote income diversity and enrich our civic life;</li> <li>• Our neighborhood can and should accommodate population growth while also preserving its hallmark livability and assuring that new development has a compatible scale, function, and character with the surrounding structures; and</li> <li>• Our residents require increased infrastructure planning -especially for public schools and transportation -that specifies how the District will meet demands for the current and future population.</li> </ul>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See summary response to Task Force report.
ANC 3/4G-13	2.12		Rock Creek West	OP's proposed amendments will not further the Commission's objectives objectives as effectively as the Commission believes is essential in the Comprehensive Plan. <ul style="list-style-type: none"> <li>• While addressing affordable housing extensively, OP's changes are not likely to accomplish their target goals, are not tailored to the needs of our neighborhood, and will not provide a significant number of new affordable housing units without more focused, specific plans;</li> <li>• OP's blanket increases to the density designations along Connecticut Avenue, NW from Chevy Chase Circle to Livingston Street, NW-the Chevy Chase Gateway<sup>2</sup> -do not provide adequate guidance or specificity and will not give the community adequate input on questions of compatibility, scale, and character nor will OP's changes create a memorable entrance to the city that establishes the identity of the District;</li> <li>• OP does not provide a plan for where new schools will be located to serve our neighborhood or how those schools will be funded to alleviate the already overcrowded elementary, middle, and high school facilities west of Rock Creek and to accommodate reasonable growth; and</li> <li>• OP has not accounted for current proposals that would eliminate some bus routes, remove some bus stops, and change the layout of Connecticut Avenue. These proposals, if implemented, could impact development and population growth and need to be considered in plans for the Chevy Chase Gateway.</li> </ul>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current language adequately addresses these issues, and a Future Planning Analysis Area has been added along Upper Connecticut Avenue to include Chevy Chase.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3/4G-14	2.12		Rock Creek West	The Commission urges OP to make the specific changes to its proposed, amendments in paragraphs 7 through 16 below. Most importantly, the Comprehensive Plan should mandate a Small Area Plan for the Chevy Chase Gateway. Such a plan is particularly appropriate because the Chevy Chase Gateway requires more focused direction than can be provided by the Comprehensive Plan, and a Small Area Plan, approved by the Council, will help guide long-range development, improve our neighborhood, achieve citywide goals, and attain economic and community benefits.3 The Commission is committed to working with the community and OP to complete the Chevy Chase Gateway Small Area Plan expeditiously so that any new development can be guided by this vision.	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; A Future Planning Analysis Area has been added along Upper Connecticut Avenue to include Chevy Chase.
ANC 3/4G-15	2.12		Rock Creek West	The Rock Creek West Area Element should include a policy statement that encourages and facilitates creative affordable housing solutions along the Chevy Chase Gateway. While traditional Inclusionary Zoning and Inclusionary-Plus Zoning can be one tool in creating affordable housing, it is not the most effective way to achieve the District's ambitious goals in our area. The Plan should recognize this neighborhood's opportunities and limitations by stimulating partnerships and coalitions of developers -non-profit and for-profit-and by acknowledging the need for significant District participation through contributions of its own resources (e.g., through the Housing Production Trust Fund or making public property available for affordable housing). The District's policy for the Chevy Chase Gateway should be to use any value created by allowing greater density as an asset to ensure the fullest achievement of affordable housing objectives.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See policies: H-1.1.8 Production of Housing in High Cost Areas, H-1.2.3 Mixed Income Housing, H-1.2.4 Housing Affordability on Publicly Owned Sites, H-1.2.9 Advancing Diversity and Equity of Planning Areas, H-1.2.11 Inclusive Mixed Income Neighborhoods.
ANC 3/4G-16	2.12		Rock Creek West	The Rock Creek West Area Element should include a policy that encourages development of affordable and workforce housing that is suitable for families and that is fully accessible to those with disabilities. The policy should also encourage and support development of resident-owned affordable and workforce housing so that residents retain a portion of the appreciation in value, but covenants should require that the units remain "affordable" for at least 15 years.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Housing Element including: Policy H01.3.1 Housing for Larger Households, Action H-1.3.B: Create tools for the Production and Retention of Larger Family Sized Units in Multi-Family Housing for guidance.
ANC 3/4G-17	2.12		Rock Creek West	The Rock Creek West Area Element should include a policy that the District will use its publicly-owned property at the Chevy Chase Public Library for future development of a new library that also includes mixed-income housing, with emphasis on affordable and workforce housing and on housing for public employees (e.g., first responders, librarians, and teachers).	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Housing Element and new language about co-location in Community Services and Facilities Element.
ANC 3/4G-18	2.12		Rock Creek West	The Rock Creek West Area Element should include a policy to preserve rent controlled units so that they are not redeveloped in a way that reduces the stock of housing that is effectively "affordable" -even if not defined as such -in order to create the false impression of having created additional units that are expressly income-restricted. The result of moving existing affordable housing from one column to another with no net gain means displacing one set of vulnerable residents for a more vulnerable group. Conversions of rent-controlled units are likely to take the pressure off building new affordable units, but achieve no real gain.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See the Housing Element Policy H-2.1.6 Rent Control for guidance on this issue.
ANC 3/4G-19	2.12		Rock Creek West	The Commission supports OP's proposed changes to the Future Land Use Map ( <a href="http://bit.ly/2JBLYfk">http://bit.ly/2JBLYfk</a> ) that increase the planned density for the Chevy Chase Gateway. The Commission asks, however, that OP include a provision in the Comprehensive Plan that the Zoning Commission may not approve any proposed density changes until completion of a Small Area Plan. The Small Area Plan should be a prerequisite so that new development will be consistent with that Plan.	03-Acknowledged	See Land Use Element and Generalized Policy Map for Future Planning Analysis Area definition. The Comp Plan can not put stipulations on the Zoning Commission, as zoning is a separate process.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3/4G-20	2.12	624.2	Environmental Protection	Policy E-4.7.2: Protecting Wildlife. Excessive lighting can also harm urban wildlife. Consistent with the goals of Sustainable DC, maintain regulations for outdoor lighting to lessen harm to wildlife, particularly migratory birds and pollinators.	04-No	Current language is sufficient and does not preclude regulatory action; The proposed amendment is beyond scope of Comprehensive Plan to recommend and implement. DDOT is actively working on lighting in the District. DOEE is actively working on protecting wildlife.
ANC 3/4G-21	2.12	624.6	Environmental Protection	Action E-4.7.C: Enforcement of Light Regulations. Pursuant to the DC Municipal Regulations enforce regulations pertaining to light trespass onto residential property.	04-No	Current language is sufficient and does not preclude regulatory action; The proposed amendment is beyond scope of Comprehensive Plan, which is a guiding document, not a regulatory tool. DDOT is actively working on lighting in the District.
ANC 3/4G-22	2.12		Urban Design	OP should expressly identify the Chevy Chase Gateway as an important entrance to the District and change Map 9-12 in the Urban Design Element ( <a href="http://bit.ly/2GnMOvD">http://bit.ly/2GnMOvD</a> ) at page 28 to include the Chevy Chase Gateway. The Rock Creek West Area Element ( <a href="http://bit.ly/2JCgwnD">http://bit.ly/2JCgwnD</a> ) should also be changed to describe the Chevy Chase Gateway in its discussion of the Connecticut Avenue Corridor (Section 2311) and should include a policy on Chevy Chase Gateway Enhancement -for instance: Support community-led planning for enhanced retail and housing strategies in the Chevy Chase Gateway that will grow and strengthen the local businesses, continue to attract and serve local residents with new developments of compatible scale, function, and character with the existing neighborhood, improve income diversity by expanding affordable and workforce housing, and establish a distinctive entrance to the city.	04-No	Current language is sufficient and does not preclude regulatory action; Map 9.2 Thoroughfare Types in DC lists key avenues, gateway boulevards, parkways, long established roads and does not identify gateway areas. Additionally, Chevy Chase is along Connecticut Avenue, which is included on the map.
ANC 3/4G-23	2.12	624.3	Environmental Protection	Policy E-4.7.1: Protecting Human Health. The District shall control light trespass onto private property, shall work to curb excessive levels of light, and shall choose the warmest color of light that is feasible in order to minimize the negative impacts of outdoor lighting on human health.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The proposed amendment is beyond scope of Comprehensive Plan to recommend and implement. DDOT is actively working on lighting in the District.
ANC 3/4G-24	2.12	624.3	Environmental Protection	Policy E-4.7.3: Reduce Sky Glow. Ensure that the US Naval Observatory can meet its operational needs related to national security by choosing low color temperature of LEDs (less than 2700 Kelvin), reducing light levels to closely follow Illuminating Engineering Society's recommendations, dim or turn off light when not needed, and promoting use of vegetation throughout the city.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The proposed amendment is beyond scope of Comprehensive Plan to recommend and implement. DDOT is actively working on lighting in the District.
ANC 3/4G-25	2.12		Rock Creek West	The Rock Creek West Area Element should include a policy that addresses the need for infrastructure -e.g., transportation, parks and recreation, libraries, utilities, and schools-that accommodates projected population growth. In particular, this Element must include a policy to create a specific plan for where, when, and how the District will locate, build, and fund public schools for the children in the Wilson High School Feeder Pattern so that new development and population growth will not exacerbate current school overcrowding. Rock Creek West is already confronting a crisis in school facility shortage, but the proposed Plan amendments do not specifically address where school capacity can be located or how it will be funded. It would be imprudent to proceed with the Plan's growth scenario while neglecting to address the hard questions about public schools and other necessary infrastructure.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; These issues are addressed in the Citywide Elements, including Transportation, Infrastructure, and Community Services and Facilities Element.