



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 3B
3818 Beecher Street NW
Washington DC 20007

RE: Advisory Neighborhood Commission 3B Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Turmail, Blumenthal, Lane, Mladinov, and Young:

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 3B, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan). Such comments included updated language on the retail and economic conditions in Rock Creek West and housing for seniors and disabled residents.

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 3B 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.

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 Receive	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3B -1	12.23		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 3B -2	2.14	2300.5	Rock Creek West	2300.5 adds a paragraph on retail districts along the area's major corridors, highlighting the competition that commercial corridors in Rock Creek West have experienced for customers and for new restaurants and retailers. This is a very important point and should be reflected in local planning and policies. This paragraph mentions Main Street organizations in the area. We would suggest that the final sentence be amended to say, "Additionally, Main Street organizations in Tenleytown and Van Ness as well as in Glover Park and Woodley Park are working to help attract desired retailers and enliven and improve the commercial areas."	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3B -3	2.14	2300.10	Rock Creek West	2300.10 adds a new sentence "Main Street organizations have been established for Van Ness and Tenleytown." We recommend that sentence be amended to add the Main Street organizations in Glover Park and Woodley Park.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3B -4	2.14	2308.8	Rock Creek West	¶2308.8 Policy RCW -1.1.7: Housing for Seniors and Disabled Residents This provision calls for the city to "Maintain and increase housing for elderly and disabled residents, especially along the major transportation and commercial corridors of Wisconsin and Connecticut Avenues." The ANC supports the objective and content of this policy but recommends that the title and first sentence be consistent in referring to "Seniors and residents with disabilities."	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 3B -5	2.14	2308.5	Rock Creek West	¶2308.5 Policy RCW-1.1.4 Infill Development This provision calls for the city to "Recognize the opportunity for infill development within the areas designated for commercial land use on the Future Land Use Maps. When such development is proposed, work with ANCs, residents, and community organizations to encourage mixed-use projects that combine housing, including affordable housing, neighborhood serving retail, and commercial uses." The amendment, however, would delete an important provision which the ANC would like to see retained: "Heights and densities for such development should be appropriate to the scale and character of adjoining communities." The ANC supports this provision as consistent with the hopes and interests of our commercial area and nearby residential areas.	02-Support. No integration needed.	Thank you for your support.
ANC 3B -6	2.14	2380.2	Rock Creek West	¶2308.2 Policy RCW-1.1.1: Neighborhood Conservation as amended calls for the city to "Preserve the low density, stable neighborhoods west of Rock Creek Park" and goes on to highlight the "character of these neighborhoods," which we support. The amendments add a new final sentence acknowledging "Updates to the Zoning Regulations offer the opportunity to create more accessory dwelling units for this area to help absorb a share of the District's growth and provide for a more proportional share of the District's growth and provide a more proportional share of affordable and moderate income housing sensitive to existing neighborhood context." Our ANC has strongly supported ADUs and also building and preserving affordable and moderately priced housing, so we support this provision with the amendment.	02-Support. No integration needed.	Thank you for your support.
ANC 3B -7	2.14	2308.4	Rock Creek West	2308.4 Policy RCW-1.1.2: Conserving Neighborhood Commercial Centers This provision calls for the city to "Support and sustain local retail uses and small businesses in the area's neighborhood commercial centers . . . Compatible new uses such as multi-family housing or neighborhood-serving office space (above local-serving ground-floor retail uses) should be considered within the area's commercial centers to meet affordable and moderate income housing needs, provide transit-oriented development, and sustain existing and new neighborhood-serving retail and small businesses." The ANC supports this provision as consistent with the hopes and interests of our area.	02-Support. No integration needed.	Thank you for your support.

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ANC 3B -8	2.14	2309	Rock Creek West	¶2309 Conserving and Enhancing Community Resources includes several provisions related to National Park Service land such as Glover Archbold Park and Rock Creek Park (¶2309.2e) and three provisions dealing with the U.S. Naval Observatory. We support those provisions. The ANC is bordered on the west by Glover Archbold Park and on the east by a narrow stretch of Rock Creek Park at the southeast corner and north of that by the U.S. Naval Observatory. The Naval Observatory Grounds are located directly behind the commercial establishments on the east side of Wisconsin Avenue for virtually the entire length of the Glover Park commercial area. Both the National Park land and the Naval Observatory provide extensive tree canopy and green areas adjacent to the neighborhood. The Naval Observatory is an important and long-time part of the community and we work coordinate when there are plans for projects within or adjacent to the Observatory Grounds. The mission of the Observatory also requires special considerations of lighting as well as building height in the Glover Park commercial district.	02-Support. No integration needed.	Thank you for your support.
ANC 3B -9	2.14	2309.2d	Rock Creek West	¶2309.2(d) highlights the policy to conserve the scenic resource of the U.S. Naval Observatory Grounds, which we are happy to see retained in the amended draft Comp Plan.	02-Support. No integration needed.	Thank you for your support.
ANC 3B -10	2.14	2309.7	Rock Creek West	<p>¶2309.7 Policy RCW-1.2.6: Naval Observatory calls for ensuring that planning decisions in the vicinity of the Naval Observatory consider the possible impacts of light pollution and take appropriate steps to avoid adverse impacts.</p> <p>There is also a policy in the Environmental Protection Element that states that regulations for outdoor lighting should be maintained that reduce light pollution and conserve energy, with particular attention to glare and nighttime light trespass in the vicinity of the U.S. Naval Observatory.</p> <p>Those provisions are consistent with the zoning code and policies, which guide the policy recommendations of the ANC as well. All the commercial properties in ANC3B along Wisconsin Avenue on both sides of the street, from Calvert Street south to Whitehaven Parkway on the west side and Whitehaven Street on the east side (also including 3300 Whitehaven Street and 2001 Wisconsin) are in the MU-27 zone, identified as the Naval Observatory Mixed Use Zone.</p> <p>The zoning code for MU-27 (§11-G800) states the purposes of the zone “promote the public health,safety, and general welfare on land adjacent to or in close proximity to the highly sensitive and historically important United States Naval Observatory, in keeping with the goals and policies of the Comprehensive Plan” and the master plan for the U.S. Naval Observatory. The MU-27 zone is also intended to “reduce or eliminate any possible harm or restrictions on the mission of the Federal establishment within the zone” and “to provide additional controls on private land to protect recognized federal interests including the critical scientific mission performed at the Naval Observatory and the security needs of the Vice President’s residence located on the grounds.” DC Code 11-G803 also specifies a 40-foot height limit in MU-27, to meet the purposes of the Naval Observatory Zone. See attached.</p> <p>The ANC supports the purposes of the MU-27 zone, and will continue to work to ensure that the zoning requirements are met, as reinforced by the Comp Plan, and the Naval Observatory grounds and mission can be maintained. Many of the structures on nearby properties in the Glover Park commercial area are not currently built to the floor area or 40-foot maximum allowable height limits. Some new development is being added that will include additional stories for residential or in some cases commercial use above first floor retail space. All proposals in the commercial area that go through zoning review must meet the specific requirements and purposes of the MU-27 zone.</p>	02-Support. No integration needed.	Thank you for your support.
ANC 3B -11	2.14		001 - General Comp Plan Comments	We are attaching recommendations for specific provisions of the draft amended Comp Plan in the Area Element for Rock Creek West which covers our ANC area, and corresponding mark-ups with specific suggestions and questions. Our recommendations focus on maintaining stable, attractive neighborhoods, supporting the vitality of the local business district, protecting and expanding the tree canopy, conserving National Park land and the U.S. Naval Observatory, considering school capacity and overcrowding in plans for housing and other development, completing sewer improvements including in Glover Archbold Park, supporting housing for seniors and people with disabilities, and providing senior wellness activities through decentralized programing at facilities around the Rock Creek West area. Also attached are some additional general priorities for other Elements of the amended draft Comp Plan on Housing, Environment, and Land Use.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Please see responses by element.

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ANC 3B -12	2.14		001 - General Comp Plan Comments	As ANC3B has highlighted in our previous comments to OP about other phases of this Comp Plan cycle, public participation is essential to effective city planning at each stage, from development of the vision and priorities all the District's plans to the specific language of the Comp Plan to Small Area Plans, plans for other agencies and parts of the infrastructure, and zoning regulations, to the review of particular projects such as PUDs or applications that go through the Board of Zoning Adjustment.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Public review is critical for ensuring District residents get the updated plan that they deserve. OP adjusted its schedule to ensure sufficient time for review while also allowing adequate time for adoption of the Comp Plan by DC Council in 2020.
ANC 3B -13	2.14		001 - General Comp Plan Comments	Though public participation was not as full as the city should have provided and as we would have liked to see through the current amendment cycle, from 2017 to 2019, we hope that OP will fully consider all comments from ANCs and members of the public in this comment period, before finalizing the draft amended Comp Plan and moving it forward to the Council for review.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; OP reviewed all feedback from the public and ANCs and amended the Comp Plan accordingly. Emails received during the public review period and ANC resolutions will be packaged and sent to Council in addition to the Mayor's Draft Comprehensive Plan Update.
ANC 3B -14	2.14		001 - General Comp Plan Comments	We hope that in coming years, OP will concentrate on designing an effective process for reaching out to the people throughout the District to hear their priorities and assess their vision for the future, consider what worked well or not as well all under the 2006 Comp Plan and the 2019 rewrite, and assess the changes recommended to correct or improve the Comp Plan, as the foundation for the actual update of the Comp Plan that is due to be completed in 2026.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; In 2016, OP launched the second amendment to the Comp Plan to ensure that it remains responsive to the community's needs. In preparation for the 2026 rewrite, OP will emphasize designing an efficient and effective process.
ANC 3B -15	2.14		001 - General Comp Plan Comments	We also would like to share a few recommendations for future updates of the Comp Plan. Though the calendar established by the Council currently in effect required a set of amendments to the 2006 Comp Plan in 2011, 2016, and 2021 leading to a complete update/rewrite in 2026 after 20 years, it is now 2020 and it may take an entire year or more for the Council to approve the amendments in the current cycle, so it is in no way practical to imagine that we could undertake another amendment cycle that would conclude in 2021. Our strong recommendation would be to skip the 2021 amendment cycle-or consider the current cycle to satisfy that requirement-and move directly to working toward having an effective, inclusive updated Comprehensive Plan in place by 2026, with all the public outreach, public input, and public review that would be required in a full public planning process that there was not time to do in this amendment process.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; This update did not involve the visioning and document re-structuring of a rewrite, but it did involve more substantial updating and outreach than the 2011 update. OP anticipates that the next amendment cycle, as called for in the current Implementation Element, will be a full rewrite. Please see the Office of Planning's Staff Report (see plandc.dc.gov) for more information.

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ANC 3B -16	2.14		001 - General Comp Plan Comments	<p>If the Council finds it necessary or desirable to adopt new legislation to guide the Comp Plan update process for 2026, we suggest that there should be:</p> <ul style="list-style-type: none"> - requirements for format evaluation of experiences with what works and what does not work as well in the Comp Plan in effect, with public outreach, public comments, and public sharing of the evaluation results before initiating a call for amendments or input for an update or rewrite of the Comp Plan - detail on what should be considered in the range of "amendments" in an amendment cycle - directions on how to elicit suggested amendments from a broad range of stakeholders, identify the reasons for the proposed amendments and the intended effects - provisions for stakeholders to submit suggestions of provisions in the Comp Plan that they would like to keep, rather than change - specifics on the timetable and notification process and potentially public hearings that OP should follow to provide for public review of proposed amendments, including adequate information and time for residents and ANCs to make an assessment and submit comments - consideration of a shorter time between full updates of the Comprehensive Plan, perhaps 15 years with two amendment cycles rather than 20 years with three amendment cycles. 	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; This update did not involve the visioning and document re-structuring of a rewrite, but it did involve more substantial updating and outreach than the 2011 update. OP anticipates that the next amendment cycle, as called for in the current Implementation Element, will be a full rewrite. Please see the Office of Planning's Staff Report (see plandc.dc.gov) for more information.
ANC 3B -17	2.14	309.12; H-1.3.4 & H-1.3.6	Housing	<p>III. HOUSING ELEMENT</p> <p>"... Creating and preserving affordable housing has been a goal that our ANC has been strongly supporting, for all levels of affordability—from severe low income to 30%, 60% and 80% of Area Median Income, including workforce housing, dedicated housing for military veterans with limited resources, long-term supported housing for formerly homeless individuals and households, as well as short-term emergency shelters for homeless families such as The Brooks on Idaho Avenue, assisted living and nursing care for seniors and others who need it. Housing will be needed for new residents, young professionals moving into the workforce, growing families, households looking to downsize, and families and individuals seeking rapid rehousing after experiencing financial crises or homelessness.</p> <p>The Comp Plan needs to provide for constructing and preserving housing in the city that will meet each of those needs, including affordable housing. The Mayor's goals of 36,000 new housing units across all wards by 2025, including 12,000 "affordable" units, while admirable, seems far short of the needs, particularly for low-cost housing. Plans need to accommodate the number of residents who are on a District waiting list for public housing and housing vouchers, are paying far more than the target 30% of monthly income on housing, need replacements for deteriorating housing where they are now living, cannot find economical housing to which they can move to fit the changing number of household members, or are currently homeless.</p> <p>High cost or "luxury housing" seems to be in ample supply, with new units being added through new construction and conversion of older units. What is in short supply is housing that can accommodate low and moderate income households. The city needs to create incentive programs to encourage more affordable units, preserve existing affordable units, identify prospective properties where affordable and mixed income projects can be encouraged, and make it a priority to encourage low and moderate cost housing along transit corridors with available services so the available sites are not being exclusively devoted to high-cost housing.</p> <p>ANC3B has a new project coming online for affordable workforce housing on Wisconsin Avenue in the Glover Park commercial district, which the ANC encourages and welcomes. It is important for additional projects to be developed on or near the Wisconsin Avenue corridor that provide affordable housing, and the ANC hopes to assist in meeting that goal. The provisions H-1.3.4 for co-housing and H-1.3.6 for Single Room Occupancy units can be very useful, along with ¶309.12 discouraging tear-downs of existing moderate cost housing.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Housing Element includes policies for preserving naturally occurring affordable housing such as Policy H-1.2.10 Redevelopment of Existing Subsidized and "Naturally Occurring" Affordable Housing and Action H-2.1.C: Purchase of Expiring Subsidized Housing and 'Naturally Occurring' Affordable Housing. The Element includes policies around incentive programs such as Policy H-1.1.2: Production Incentives, Policy H-1.2.7: Density Bonuses for Affordable Housing, Action H-1.4.D: Tax Abatement, Policy H-1.5.4: Financial Incentives, Action 2.1.I: Improve Tenant Opportunity to Purchase Program, Policy H-4.2.5: Reducing Housing Barriers for Persons Experiencing Homelessness. Recommended amendments to the FLUM includes increasing opportunities for housing production along Wisconsin Ave

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ANC 3B -18	2.14		Housing	The District must also specifically plan for housing that provides services to individuals requiring ongoing assistance for social services or medical or mental health treatment, whether they have been experiencing homelessness or facing other challenges. If District agencies have assessed individuals as needing support services and assigned case workers or other service providers to assist them, it is essential that they not be cut off from the services when they are able to move to a new unit such as dedicated affordable housing, whether under a voucher program or other public housing program. That has been happening too often and it is not right or fair or effective in protecting the health and quality of life of residents. Our ANC has maintained close touch with DHS, DBH, DCHD, the Council, senior services agencies and providers of services for individuals experiencing homelessness, and this is always a major issue in the discussion. Residents who have been receiving social services and medical or mental health services and have been identified as needing continuing assistance deserve better from the city. The Comp Plan and other plans for housing and other services must not ignore these vital social and health needs, and just focus on the availability of physical units to house them. The city must provide for those needs or we will not be meeting stated goals for housing equity.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See the Housing Element Policy H-4.1.1: Integration of Residents with Special Needs and Policy H-4.2.2: Neighborhood-Based Homeless Services for guidance on these issues.
ANC 3B -19	2.14		Lower Anacostia and Near Southwest	<p>V. AREA ELEMENT ANACOSTIA RIVERFRONT</p> <p>The Anacostia Waterfront is a large and uniquely special area with huge potential and major attractions to meet many different interests. Should the Anacostia Waterfront be heavily developed for commercial use? Should the Anacostia Waterfront be planned for people other than the residents living nearby who need and want to have parkland and recreational facilities there to enjoy with their families and friends? Is commercial development the highest and best use for that special riverside environment, particularly when the city is looking for ways to keep green space, preserve natural habitat, and reduce impervious surface area in the city? Is there a need for a regional-scale commercial center along the Anacostia waterfront or would it be more appropriate to plan local-scale attractions for the local community that would better serve their needs? Can all these interests be accommodated in that area? The residents closest to the Anacostia Waterfront should be at the heart of planning efforts for that land and the major environmental and recreational amenity it represents for the community.</p> <p>There are also questions of whether there a risk that a large regional commercial development along the Anacostia Waterfront would draw patrons from existing developments and make it more difficult for the restaurants and other business establishments in those areas to survive and thrive. The District has the Georgetown Waterfront, Navy Yard, and the Southwest Waterfront/"The Wharf" which are developed with restaurants and bars and promenades that are crowded in evenings and weekends with tourists as well as residents from around the region. The city also has seen mixed use development with restaurants, shops, other commercial and residential projects in NoMa, H Street, 14th Street, Union Market, Shaw and other emerging centers for cafes and theaters and bars and related destination commercial establishments. They are competing with each other and with the older commercial centers around the city including Georgetown and neighborhood commercial centers along Wisconsin Avenue and Connecticut Avenue in Rock Creek West. The new areas offer vibrant, eye-catching contemporary developments that draw people from miles away to experience the food and entertainment available there. Is the market sufficient that they can attract sufficient customers without taking away from the business that the other areas need to sustain themselves? If not, it is important to consider those potential effects before developing new plans for commercial development along the waterfront land in the District and committing to more large-scale development along the same lines those other areas have followed. And the process of developing a vision for that area of the waterfront on the south side of the Anacostia River should start by including the people living closest to that waterfront land, the people of Anacostia.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Guidance in the Lower Anacostia/Near Northwest contains significant guidance on the development on the Anacostia Waterfront and continued community access.
ANC 3B -20	2.14		Rock Creek West	supporting and preserving stable neighborhoods so they can provide a high quality of life for new and existing residents;	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The narrative and policies in the 25 Elements of the Comprehensive Plan provide guidance on providing a good quality of life for existing and future residents.

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ANC 3B -21	2.14		Rock Creek West	supporting mixed use including retail and other commercial as well as residential use in neighborhood commercial districts along major transit corridors;	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Policy Focus Areas direct mixed-use growth to corridors and metro stations.
ANC 3B -22	2.14		Rock Creek West	planning for additional school capacity along with plans for additional housing for families in the area;	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Educational Facilities Element provides guidance on schools.
ANC 3B -23	2.14		Rock Creek West	ensuring that plans for other development are coordinated with plans for transportation and other infrastructure to ensure that adequate services are available for new and existing residents;	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; DDOT and OP jointly review development applications.
ANC 3B -24	2.14		Rock Creek West	providing housing options such as permanent supported housing in the Rock Creek West area for individuals assessed with ongoing needs for medical and mental health care and other social services, to ensure that their current services continue when they move and they are not left without required assistance in units that do not sustain their quality of life;	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See the Housing Element Policy H-4.1.1: Integration of Residents with Special Needs, which speaks to the importance of supportive services.
ANC 3B -25	2.14		Rock Creek West	providing for public participation in reviewing and commenting on future changes to the Comp Plan as well as plans for developments that use city funding or require zoning approval	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; There are opportunities for public comment integrated into the land development process.
ANC 3B -26	2.14		Rock Creek West	As many residents, planners, business people, and local officials have observed, the District has changed a great deal since 2006, in ways that are visible and tangible in how the city and its neighborhoods look and operate and in other ways that are unseen but felt. Some challenges remain the same, others have evolved, and many new challenges have emerged. Our expectation and recommendation is that when OP next takes up the Comp Plan for amendments or rewrites, the process should begin with wide-ranging outreach that reaches a large share of residents and other stakeholders around the District, with the intention of understanding the people's vision and priorities. It should also consider what has worked well and what has not worked as well in the Comp Plan in the intervening years. That combination of listening and learning and evaluating, against a backdrop of standards and principles that reflects a range of views and interests of the public, can create a foundation for considering what portions of the Comp Plan should be amended or rewritten and what changes are needed to satisfy the overarching vision of the people for their city.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; In 2016, OP launched the second amendment to the Comp Plan to ensure that it remains responsive to the community's needs. In preparation for the 2026 rewrite, OP will emphasize designing an efficient and effective process.

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ANC 3B -27	2.14		Rock Creek West	<p>Casey Trees, the non-profit that works with households and organizations to plant and care for new trees, recently shared maps and statistics about the extent of impervious surface in the District, which has been increasing over recent decades. The latest estimate is that 43% of District land area is accounted for by impervious surfaces, including paved streets and sidewalks, parking lots, impermeable playgrounds and patios, as well as rooftops. In contrast, the area categorized as "tree canopy cover" is only 38% of the District land area and the aerial maps show a steady reduction in tree canopy from 1984 to recent years. In 2016, the Mayor established new goals for the tree canopy in the District, aiming for 40% tree canopy cover by 2032, which will require preserving existing trees, planting more trees, and replacing damaged or dying trees that have to be removed.</p> <p>Impervious surfaces absorb heat, creating higher ambient temperatures around the city (the "heat island" effect) and exacerbating breathing problems, stress, and other health challenges. Impervious surfaces also create increased runoff into our storm sewers, often containing oils and other chemicals, waste products and sediments flowing into storm sewers and on to rivers and streams. Trees and plants can have an opposite effect, increasing shade, reducing heat, absorbing carbon dioxide. Recent research indicates that low-income neighborhoods often have more impervious surface areas than other areas of the city and a smaller proportion of tree canopy. The result is higher temperatures in the summer which are also related to worse health outcomes for residents. This is another example of environmental injustice, and it is good to see the concerns reflected in the Comp Plan ¶E-1-1.2 Urban Heat Island Mitigation, which includes tree canopy. These considerations should be part of land use policies, development plans and decisions throughout the District.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See policies in Environmental Protection Element that speak to the importance of tree canopy preservation.
ANC 3B -28	2.14	2300.2	Rock Creek West	<p>¶2300.2 notes "Rock Creek West's most outstanding characteristic is its stable, attractive neighborhoods." We are pleased to see that paragraph retained, as the stable attractive neighborhoods in our ANC provide a high quality of life for people who live there and visit, shop, or go to the parks and restaurants and other commercial establishments. The character of the neighborhoods is very important in attracting and retaining residents and businesses.</p> <p>We would also point to the importance of the tree canopy to the environment, which we highlight in the section on the Environment below. This should be referred to as a major part of the character of the neighborhoods in this paragraph and should be emphasized as a major part of ¶2309 Conserving and Enhancing Community Resources, including the Naval Observatory Grounds (see below), ¶2309.4 National Park Service Areas, and ¶2309.6 historic resources.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Language in the Environmental Element applies to all Area Elements and is sufficient for this purpose.
ANC 3B -29	2.14	2309.5	Rock Creek West	<p>¶2309.5 Policy RCW-1.2.4: Cultural and Tourist Attractions mentions a policy to "encourage broader recognition of other attractions in the area, such as the Naval Observatory . . ." Our neighborhood is fortunate to have the large green area and significant and attractive tree canopy provided by the Naval Observatory, which is lovely to see from a distance, outside the fences. We would note that with present security provisions and extremely limited areas or opportunities for tourists to observe the grounds and structures, the potential for additional recognition of the Naval Observatory as an attraction seems minimal.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The current language recognizes the importance of the Naval Observatory.

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ANC 3B -30	2.14	2309.12	Rock Creek West	<p>¶2309.12 Action RCW-1.2.A: Combined Sewer Separation calls for the city to “continue efforts to separate storm sewers and sanitary sewers within the area’s stream valleys, with a priority on rehabilitating the combined sewer in Glover Archbold Park.”</p> <p>The ANC is pleased to see the mention of rehabilitating the sewer in Glover Archbold Park, which the community has been discussing with DC Water since 2013 and we are anticipating that in the next few years DC Water and the National Park Service will release a draft environmental assessment and circulate it for public review and comment. We believe, however, that the action statement as written may be misleading and partly incorrect. First, to the best of our knowledge, the rehabilitation of the sewer pipe in the stream valley in Glover Archbold Park does not involve separating storm sewers and sanitary sewers, and should not be included in a sentence about that effort. Second, we understand that the city is not pursuing separation of combined sanitary and stormwater systems right now except in two limited locations where combined sewers spill into the Potomac River in Georgetown south of the C&O Canal (CSO 25 and CSO 26). We recommend the following:</p> <p>PROPOSED NEW WORDING: ¶2309.12 Action RCW-1.2.A: Improvements to Combined Sewer Systems Complete current efforts to separate storm sewers and sanitary sewers. Place a priority on rehabilitating the combined sewer in Glover Archbold Park.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current language adequately addresses the issues related rehabilitating the sewer in Glover Archbold Park.
ANC 3B -31	2.14	2309.15	Rock Creek West	<p>¶2309.15 Action RCW-1.2.D: Senior Wellness Center Development calls for the city to “develop a wellness center in the Rock Creek West Planning Area, partnering with existing facilities that serve all ages and community groups to provide decentralized programming, activities, and services to the area’s large population of older adults.” Our ANC pays close attention to interests and issues of seniors in the area, and for several years we have participated in discussions with seniors and providers of senior services about proposals for improving wellness services for area seniors. Wards 2 and 3 do not have a fixed facility designated as a Senior Wellness Center and the city has asked about establishing a single wellness center for the area, but many of our constituents do not support having a single fixed base senior for that purpose. Because the area west of Rock Creek is so large and senior adults reside in every neighborhood from Palisades and Georgetown to Chevy Chase, the distance from any one location in Rock Creek West to a fixed senior wellness center in another part of the area could be as much as 6 miles. That is a considerable distance for seniors to have to go for a daily or weekly activity. To be most effective at drawing seniors and meeting their needs, activities much closer to their home would be much more convenient and practicable. For that reason, our ANC strongly supports the current pilot program sponsored by the city to develop “satellite” wellness centers at multiple locations around the Rock Creek West area.</p> <p>We appreciate the addition of a new clause in this action item about using “existing facilities that serve all ages and community groups to provide decentralized programming, activities, and services to the area’s large population of older adults,” With that amendment, however, the paragraph seems ambiguous about whether it is recommending: a senior center at some fixed location in the Rock Creek West area or more of a “virtual” center offering services at many different locations in Rock Creek West coordinated across the area but not an actual fixed senior wellness “center.”</p> <p>This has been a subject of dialogue and coordination among residents, ANCs and Councilmember Mary Cheh, as well as Iona Senior Services as the designated provider for senior services in Ward 3, and the DC Office on Aging (now the Department of Aging and Community Living). The Council has provided funding for the pilot efforts to create a satellite wellness center for Wards 2 and 3. We would recommend that the provision be amended to reflect those facts:</p> <p>PROPOSED NEW WORDING: ¶2309.15 Action RCW-1.2.D: Senior Wellness Services Develop and support a strong senior wellness program in the Rock Creek West Planning Area using existing facilities in the community to provide decentralized programming, activities, and services to the area’s large</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Current language adequately addresses the topic, as older adults would be served by these community Wellness Centers.

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ANC 3B -32	2.14		Housing	<p>B. Preserving Affordable Housing on the Market: Our ANC area is known as one of the few places where young professionals and others can find affordable housing in an attractive neighborhood within relatively short distance from downtown, jobs, schools, and essential services. For the health and vibrancy of the community and the continued diversity of income and backgrounds of residents, it is vitally important to preserve this type of affordable housing in our neighborhood, whether in rent-controlled buildings, accessory dwelling units, co-housing or other economically priced housing that currently exist in Glover Park-Cathedral Heights, even as the city also increases the number of new affordable units being created. The same applies across the city. The city should have clear goals for building and preserving these types of affordable housing in the market, though they may not meet the definition of “dedicated affordable housing” limited to residents at certain income levels, under publicly subsidized programs. Policies to provide financial Incentives should also be considered.</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See call out box Meeting the Need for “Workforce Housing” Moderate Income Housing and Policy H-1.2.5: Moderate Income Housing for guidance on this issue.
ANC 3B -33	2.14		Housing	<p>C. Linking Housing Plans to Infrastructure Plans: The Mayor’s housing goals call for significant additional housing around the city, including in transit-oriented developments along Metrorail routes. In Rock Creek West, the Comp Plan highlights Friendship Heights as well as portions of Connecticut Avenue for additional housing density. The additional residents associated with the new housing units will necessarily require additional infrastructure, whether it is utility services, transportation, or public facilities. The capacity of the infrastructure and plans for expanding it must be considered at the same time the housing is planned, or the area will not be able to continue to function effectively for any residents.</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See the Housing Element Policy H-1.4.6: Whole Neighborhood Approach for guidance on this issue.
ANC 3B -34	2.14		Housing	<p>D. Planning for School Capacity: The city’s estimates are that all the elementary schools in Ward 3 will be at more than 110% of capacity in the coming decade. Many of those schools are already operating at more than that level and are likely only to face greater shortages in capacity compared to the number of students who would like to enroll. In recent years, our local elementary school, Stoddert School has ranked as the most overcrowded school in the city, with enrollment at 135% of capacity—the most overcrowded school in the city. Even after a recent renovation, the school is using closets, administrative space and “demountable” classrooms to accommodate all the students. Other elementary schools in the area, along with the middle schools and high school, are also operating over their estimated capacity. The educational quality at local schools remains high, but the overcrowding creates serious strain on the facilities and limitations on the educational experience the schools can offer. It is a major concern for the community that future additions to the housing stock, particularly for families, will add further to the problems of overcapacity. The city is already struggling to identify remedies for the overcrowding situation, even as forecasts of future enrollment in the Rock Creek West area continue to rise.</p> <p>The 2018 Public Education Master Facilities Plan predicted that 2,500 more students would be enrolling in Wilson feeder schools by 2027-2028. Many of the local elementary schools have been beautifully renovated and expanded over the past decade, and are already overcapacity again. The sites are built out to the point that the required capacity is going to require construction of additional schools. Over the past two years, the Wilson High School Feeder Pattern Community Working Group developed an assessment of expected capacity needs and estimated that 2025 “high-end” forecast scenarios, the average projected utilization across the feeder pattern would reach 128% in their “high end” forecast. In its February 8, 2019, report, the Ward 3-Wilson Feeder Educational Network called for construction of two new elementary schools, a middle school, and a high school. Sites would have to be identified for any of these new schools.</p> <p>The city’s next Master Facilities Plan should address this serious challenge, and deal with the question of how and where land can be found for needed new schools, how development can be distributed to encourage residents to make use of schools that are operating at less than capacity, and how housing projects can be located to ease strain on already overcapacity schools. Planning for housing development in areas with overcrowded schools must take into account potential effects on public school enrollment, and planning for school capacity must accompany plans for additional housing for families in the area.</p>	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See the Housing Element Policy H-1.4.6: Whole Neighborhood Approach; The Community Services and Facility Action CSF-1.1.A: Civic Master Public Facilities Plan; in Education Element citation 1200.2 which addresses the crucial educational facilities issues facing the District of Columbia. These issues include: ...Continuing to plan for and investing in new and existing school facilities to meet the District’s growth and enrollment needs while delivering spaces that reflect best practices in building configuration and design. Also see 1201.1: The overarching goal for educational facilities is: to provide facilities that accommodate population growth and inspire excellence in learning; create an adequate, safe, and healthy environment for students.

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ANC 3B -35	2.14		Housing	"The District must also specifically plan for housing that provides services to individuals requiring ongoing assistance for social services or medical or mental health treatment, whether they have been experiencing homelessness or facing other challenges. If District agencies have assessed individuals as needing support services and assigned case workers or other service providers to assist them, it is essential that they not be cut off from the services when they are able to move to a new unit such as dedicated affordable housing, whether under a voucher program or other public housing program. That has been happening too often and it is not right or fair or effective in protecting the health and quality of life of residents. Our ANC has maintained close touch with DHS, DBH, DCHD, the Council, senior services agencies and providers of services for individuals experiencing homelessness, and this is always a major issue in the discussion. Residents who have been receiving social services and medical or mental health services and have been identified as needing continuing assistance deserve better from the city. The Comp Plan and other plans for housing and other services must not ignore these vital social and health needs, and just focus on the availability of physical units to house them. The city must provide for those needs or we will not be meeting stated goals for housing equity."	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Policies in the Housing Element including, Policy H-4.1.1: Integration of Residents with Special Needs; and Policy H-4.2.2: Neighborhood-Based Homeless Services; as well as the Community Services and Facility Element Policy CSF-5.2.1: Supportive Services for Returning Citizens.
ANC 3B -36	2.14		Rock Creek West	emphasizing the importance of preserving and enhancing the tree canopy and avoiding or reducing "heat islands" in all plans for land use and other economic development;	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See policies in Environmental Protection Element, including E-1.1.2 Urban Heat Island Mitigation and E-2.1.6 Urban Tree Canopy Goals related to this issue.
ANC 3B -37	2.14		Rock Creek West	carrying out environmental goals adopted in the Clean Energy DC legislation last year, including energy conservation, reduced use of fossil fuels, and increased use of renewable energy, which should be built into plans for economic development, construction and renovation, and other land use plans and design decisions	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The Clean Energy DC Omnibus Act of 2018 is covered extensively in the Environmental Protection Element.
ANC 3B -38	2.14		Rock Creek West	creating and preserving affordable housing and moderate cost housing in the area, to ensure that housing options are available in our area for residents at all income levels rather than just high cost or luxury housing, whether in new or existing buildings;	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Housing affordability is covered extensively in the Housing Element and emphasized in all area elements.
ANC 3B -39	2.14		Rock Creek West	These types of points about priorities would usually be included in a section of the Comp Plan entitled "Priorities." OP, however, did not conduct a comprehensive outreach process to identify the people's vision and priorities for the city, the functional areas covered in the plan, or various part of the city, that means there is no section of the draft plan presenting a new vision or priorities for our area, Rock Creek West. That section of the 2006 plan is simply omitted from the Area Element and placed in an appendix. For that reason, we have tried to represent priorities that have been raised to our ANC and will offer them on several key topic areas in the draft, with the hope they will be useful as guidance for this and future drafts of the Comp Plan.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; The community priorities sections will be included in the Draft of the Comprehensive Plan submitted to Council.

Resolution Number	Date Receive	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3B -40	2.14		Rock Creek West	<p>ROCK CREEK WEST AREA ELEMENT: Neighborhoods</p> <p>The Rock Creek West Area Element highlights the importance of preserving stable, attractive residential neighborhoods. The quality of life in the area is generally perceived as very high, which is related to economic vitality, environmental quality, public safety and security, good public services, parks and recreation, sound housing stock, the supportive and welcoming community, and the energy created by a vibrant, diverse population engaged in the life of the community. Those are characteristics that neighborhoods aspire to, and residents want to sustain, so the ANC area appreciates the emphasis in the Area Element on preserving stable neighborhoods.</p> <p>The major arterial street in Glover Park-Cathedral Heights is Wisconsin Avenue, including the commercial area in Glover Park which has recently been selected for one of the city's newest Main Street programs. One of the challenges for the Glover Park commercial area and the Main Street is sustaining the level of retail and commercial activity by attracting new businesses and keeping the vacancy rate low for storefronts and other commercial properties. Competition with online sales has affected retail businesses around the city and the nation, while restaurants and cafes are in competition with establishments in other neighborhoods. The development of new hubs of retail and restaurants and entertainments destinations in areas such as 14th Street NW, H Street NE, NoMa, Union Market, the Wharf and Navy Yard draw customers from District neighborhoods as well as tourists and visitors from around the region. Many local businesses in Glover Park have noted that the combination of on demand delivery to your door and easy access to relatively economical ride-hailing services have made it much easier to take advantage of attractive dining and shopping options other than the establishments a short walk away on Wisconsin Avenue, and that has cut significantly into their business. Nearby neighborhood commercial corridors including those guided by Main Street programs in Woodley Park and Tenleytown, as well as Cathedral Commons, Cleveland Park and Georgetown-Burleith also compete with each other for customers, especially in a market where a declining number of brick and mortar retail establishments are able to sustain themselves.</p> <p>Other highly popular areas have lost commercial tenants as the number of visitors and the volume of purchases go down, leaving vacant properties and dwindling chances to sustain the businesses that remain. This is a challenge that ANCs and planners around the city will have to take into account. Some properties that have been in use for commercial and retail for decades back, as long as any current residents can remember, are difficult to rent for new restaurants or retail. Are they going to be viable for that use in the future? Mixed use and residential development may help to support local retail businesses, or residences may replace retail and commercial uses in some instances. Close market analysis and careful planning.</p>	03-Acknowledged	See Land Use, Transportation, and Economic Development Elements.
ANC 3B -41	2.14		Rock Creek West	<p>II. ROCK CREEK WEST AREA ELEMENT and ENVIRONMENTAL PROTECTION: Tree Canopy</p> <p>The Comp Plan includes a text box about the environmental goals adopted in the Clean Energy DC legislation last year, as well as goals expanding the tree canopy and reducing the effect of "heat islands." These goals are important for all areas of the city, and should be incorporated in plans for development including construction and renovation and other land use decisions.</p> <p>The city's many trees are a distinctive feature which adds to the attractiveness for visitors and residents. At ANC public meetings in the past year where the Comp Plan was discussed, several residents highlighted the importance of preserving the green appearance created by the street trees and other landscaping, which are so noticeable to anyone arriving in the city. That includes arrivals via the "gateways" in Rock Creek West, for example, the circles at Western Avenue and Massachusetts Avenue and at Western Avenue and Connecticut Avenue.</p>	03-Acknowledged	As noted, the Environmental Protection Element include guidance on the importance of tree canopy.
ANC 3B -42	2.14	2309.12	Rock Creek West	<p>¶2309.9 Policy RCW-1.2.8: Schools and Libraries calls for expansion, renovation and improvement of area schools, which is an important priority for our ANC, as our local public elementary school is among the most crowded in the city. One of the proposed amendments removes a clause that alluded to the importance of considering schools "operating at or above capacity . . . in the approval of any residential development that could exacerbate school overcrowding." With such severe overcrowding in area schools already, and which is getting worse year to year we also would also call for any development of additional housing to accommodate families to be planned in coordination with plans for adding capacity at DC public schools.</p>	03-Acknowledged	See Housing, Educational Facilities, and Community Services and Facilities Elements.

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ANC 3B -43	2.14		Housing	<p>A. Definition of Affordable Housing: One concern raised in ANC3B and other ANCs is the suggestion in the amended Comp Plan, as well as in the Housing Equity Report of October 15, 2019, to define affordable housing goals only in terms of "dedicated affordable housing" that will be "limited to" individuals meeting certain income standards. That approach would only count those forms of "dedicated" housing as distinguished from "naturally occurring" affordable housing available on the market, such as rent-controlled apartments and other housing priced at levels affordable to people with low or moderate income. See the new paragraph after ¶P500.3 of the Housing Element (p. 3 of 79)</p> <p>Publicly supported housing, such as public housing and housing provided under public programs such as Housing Choice Vouchers may be easier to count and map than the fuller range of affordable housing, but that does not mean that for policy purposes the city should not pay very close attention to the wide range of other affordable housing in its planning and analysis. If city agencies and plans accept the suggested definition in setting and carrying out goals for creating and preserving affordable housing in the coming years, the District will be missing a major part of the housing that meets the needs of low and moderate income residents today. The greatest loss of affordable housing in the District in recent decades has been in the "naturally occurring" category where the housing is provided and paid for in the private market. That does not make the losses any less damaging for the residents or the city. It is very important that the city does not lose increasing numbers of housing units that are now available at affordable prices on the market, including rent-controlled apartments and private homes, which are already highly vulnerable to being razed and replaced or converted to higher priced housing as development pressures continue.</p>	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The Housing Element describes the difference between affordable housing and housing affordability in Call-Out Box. See section H-1.1 Expanding Housing Supply for policies on naturally occurring affordable housing. Also see Policy H-1.2.10 Redevelopment of Existing Subsidized and "Naturally Occurring" Affordable Housing and Action H-2.1.C: Purchase of Expiring Subsidized Housing and 'Naturally Occurring' Affordable Housing.
ANC 3B -44	2.14	RCW-2.1.1	Rock Creek West	<p>ANC 3/4G also has emphasized the importance of maintaining the environmental character of the Connecticut Avenue gateway. The tree canopy and "green" look of the area that visitors see as they enter the city are a particularly valued part of the character of the area. The trees and parks and "public parking" not only contribute to the quality of life but also to the quality of the overall environment and health for the community and the city as a whole, through the reduction of carbon dioxide, a key greenhouse gas, as well as the reduction of temperatures at the street level, the "heat island" effect that creates micro-level and macro-level harms to human health and well-being and human and environmental health in the city. Perhaps those points could be added to the sections on the three Policy Focus Areas, such as in ¶2311.7 Policy RCW-2.1.1: Connecticut Avenue Corridor.</p>	04-No	Recommendation is sufficiently covered in another element/policy/action; The Environmental Protection Element deals with these issues, please see Policy E-1.1.2: Urban Heat Island Mitigation; Policy E-2.1.6: Urban Tree Canopy; and in the Urban Design Element New Text Box: Public Parking.

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ANC 3B -45	2.14	309.6	land use	<p>IV. LAND USE ELEMENT: SUCCESSFUL NEIGHBORHOODS</p> <p>The ANC appreciates the emphasis in the Rock Creek West Area Element on maintaining and preserving stable neighborhoods. But the Land Use Element that deals with overall planning for neighborhoods does not use the word "stable." The amendments dealing with "Successful Neighborhoods" and policies to ensure a high quality of life in the District's residential neighborhoods would remove the word "successful" from critical provisions and instead use the word "inclusive" echoing the title of the 2006 Comp Plan, "Building an Inclusive City." [See ¶308 and following sections of the Land Use Element].</p> <p>The ANC agrees with the goals of an inclusive city that welcomes all residents in all neighborhoods and communities. That is an important value for the city, as the Comp Plan highlights. But to capture the full meaning and goals of successful neighborhoods still included in various other provisions of the Land Use Element, it would be more in keeping with the rest of the language and provisions if the title of this section and other provisions dealing with the character of neighborhoods NOT substitute the word "inclusive" for the word "successful" in the title and other operative sentences, but use "inclusive" as part of the title and description of successful neighborhoods. It would be far more meaningful and helpful for residents, communities, and planners trying to sustain and foster well-functioning, healthy, safe and inclusive neighborhoods if the headings and opening sentences of those sections of the plan refer to the range of characteristics that make for a "successful neighborhood" and a "great neighborhood," as other paragraphs in those sections still call for, including ¶309.6 "What Makes a Great Neighborhood?" As important as being inclusive is and will continue to be, achieving a vibrant, thriving, and welcoming neighborhood requires other features if it is going to be viable and sustainable for the longer term, including economic strength, access to housing and transportation, the quality of public facilities and amenities, schools, parks and physical environment, recreational and social opportunities, and less tangible aspects of the "social capital" of a community. The key paragraphs about planning for high quality of life in District neighborhoods should continue to reflect more of those factors, even as they underline the importance that the neighborhoods be inclusive.</p>	04-No	<p>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. Similarly, the same approach was taken when describing "successful" neighborhoods.</p>