

District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 3D  
PO Box 40846  
Palisades Station  
Washington DC 20016

RE: Advisory Neighborhood Commission 3D Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Elkins, Berlin, Del Moral, Ela, Gorsevski, Karnofsky, Kravitz, Sriquei, Szymkowicz, and Warnke:

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 3D, 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 3D 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 Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3D-1	2.6		001 - General Comp Plan Comments	<p>The current Comprehensive Plan is riddled with internal policy and data inconsistencies. The coherence and integration of the document needs to be materially improved, especially now that the Comprehensive Plan has already assumed a larger role in zoning and development decisions than many envisioned at its writing. The Office of Planning's [OP] proposed changes are in this direction and, hereby, obtain our support. We would like to see OP go further than currently proposed in rectifying the competing policies and data inconsistencies within the document. (We understand that at the time the Comprehensive Plan was written, a guidance role was envisioned for the document; it was to work alongside zoning regulations but not be equal in legal weight to the zoning code. In our view, this guidance role has been inappropriately supplanted over time so that the Comprehensive Plan functions similarly to the zoning code. Policy inconsistencies that were unfortunate in the former scenario are entirely unacceptable in the latter.)</p> <p>Further, we implore OP to make explicit its intention that the Comprehensive Plan is a guidance document and not a document on equal footing to the zoning code before government bodies. To the extent that OP believes the courts have misinterpreted this intention, we encourage OP to restate how it intends this version of the Plan to be viewed by government agencies and the courts.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The Comprehensive Plan is a guidance document. Please see the Introduction Element for more information. Additionally, please see the Office of Planning's Staff Report on <a href="http://Plandc.dc.gov">Plandc.dc.gov</a> .
ANC 3D-2	2.6		001 - General Comp Plan Comments	<p>Elements of the existing Comprehensive Plan have been weaponized to varying degrees in an effort to stall development across the District. OP needs to look closely at which parts of the Plan may be used for purposes different than their original intent and clean up the language to foreclose misuse. OP's currently proposed changes are in this direction, but we would like to see OP go further than currently proposed.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Language in the Comprehensive Plan that has been contradictory, inaccurate, or caused ambiguities has been edited to clearly articulate the Comp Plan's narrative, policies, and actions.
ANC 3D-3	2.6		001 - General Comp Plan Comments	<p>Since the Comprehensive Plan plays a large role in guiding (or determining at-present) development and zoning decisions, it is imperative that the Plan mandates District decision makers take a broad, holistic view of development.</p> <p>For example, the affordable housing goals and the distribution of the apparent planned responsibility for achieving these goals across the planning districts – for the purposes of reaching more equitable spatial distribution and a higher level of overall affordable housing provision – are cited by your office with little to no mention of the necessarily complementary needs for educational and transport infrastructure to accommodate both the new residents and the existing ones. We accept the view that development is coming. Generally, this prospect is positive, but even if not in all aspects it is likely that development is still going to occur. Thus, it is critical in our view that the city address all complementary aspects of development in the Comprehensive Plan. We list several such examples here. In our planning district, the public schools are uniformly over-capacity and the city has continually failed to produce any document or plan sufficient to alleviate this problem. Development brings more students to our schools, which we support. But it also exacerbates our existing capacity problem. The Comprehensive Plan should instruct decisionmakers to engage seriously with school capacity when evaluating development proposals. (A one-page letter from the Deputy Mayor for Education stating that he expects minimal impact on school crowding from a potential development project is inadequate and too late to do any good.) We do not ask that approval of development projects be made conditional on a credible, acceptable plan to address school capacity issues, but we fear that the city will continue to underperform on addressing this critical issue. Development brings more people generally. These new neighbors need viable transportation infrastructure and options. We want to see the Comprehensive Plan speak to this need when evaluating development proposals. The importance of this point is heightened by WMATA's current proposal to significantly cut back several bus lines in our area. There is also a spatial aspect of the desirability of more intense development that we wish to see addressed more explicitly within the Comprehensive Plan. Namely, development projects should be more strongly encouraged at locations with established transportation infrastructure, such as at Metro stations and along major arterial roads. This transit-oriented development approach is one that has been successfully implemented by other major US cities.</p>	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; For information on affordable housing production and preservation, see the Housing Element. For housing policies, actions, and analysis that are beyond the scope of the Comprehensive Plan, see the Framework for Housing Equity and Growth. The Framework for Housing Equity and Growth is a cross-agency initiative that relies on public input. Please see <a href="http://housing.dc.gov">housing.dc.gov</a> for additional information and updates on opportunities to engage. In addition, the District will be launching a civic facilities plan to address the needs of a growing population on neighborhood resources.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3D-4	2.6		001 - General Comp Plan Comments	Other infrastructure needs should be similarly addressed. A lack of adequate water pressure during a 2009 fire forced firefighters to go five blocks away from the home to find a hydrant with sufficient pressure, preventing the fire from being contained in time. Likewise, some areas of our community lack the requisite gas pipes for certain cooking and heating options. More neighbors necessarily increase the burden placed upon the already inadequate infrastructure. Without properly addressing these linked infrastructure needs during review of a proposed development, the existing problems will be worsened to the detriment of all. The list goes on. We need to ensure adequate playgrounds, libraries and retail options (including grocery stores) are available to accommodate new residents.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; For information on affordable housing production and preservation, see the Housing Element. For housing policies, actions, and analysis that are beyond the scope of the Comprehensive Plan, see the Framework for Housing Equity and Growth. The Framework for Housing Equity and Growth is a cross-agency initiative that relies on public input. Please see <a href="http://housing.dc.gov">housing.dc.gov</a> for additional information and updates on opportunities to engage. In addition, the District will be launching a civic facilities plan to address the needs of a growing population on neighborhood resources.