



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 3E
Lisner-Louise-Dickson-Hurt Home
5425 Western Avenue, NW
Washington, DC 20016

RE: Advisory Neighborhood Commission 3E Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Bender, Ehrhardt, Hall, Quinn, and McHugh:

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 3E, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan). Such changes include updates to the Future Land Use Map along Wisconsin Avenue, the Dancing Crab Lot, and the Whole Food Lots.

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 3E 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,

Andrew Trueblood

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3E-1	2.14		FLUM	1. ANC 3E strongly believes a broad and robust planning process would provide a greater opportunity for community input for the Wisconsin Avenue Corridor between Van Ness Street and Western Avenue and would lead to better policy outcomes than considering FLUM and broader neighborhood needs sequentially. Accordingly, we prefer a plan for the corridor that would study lot by lot how best to transition between the commercial corridor and the adjacent single family homes. ANC 3E therefore strongly urges DCOP to immediately initiate a small area planning process for this area and to postpone the implementation of the changes to the FLUM for one year to allow for a small area plan. However the ANC does not believe a planning process should be a mechanism to put a halt to all development via a "death by process" and requests that if the small area plan has not been completed and submitted to the DC Council within 1 year of the formal passage of the FLUM revisions that the changes to the FLUM go immediately into effect.	01-Yes	See the Generalized Policy Map for recommendations on Future Planning Analysis Areas.
ANC 3E-2	2.14	9976	FLUM	9976 (the "Dancing Crab Lot"): This lot is far from any single family housing, and close to Wisconsin Avenue. OP proposes to keep the lot medium density. Although we do not oppose that recommendation if no SAP process is initiated, we believe that if there is an SAP process, this lot should be a candidate for high density residential. This lot would then be high density residential and medium density commercial. In general, when we refer to possible Up FLUMing, we are referring to the residential portion, and intend no change to other parts of the proposal).	01-Yes	The FLUM reflects this proposal. Additionally, the Generalized Policy Map (GPM) identifies this area for a future planning analysis for further study.
ANC 3E-3	2.14	2155.9	FLUM	2155.9 (the "Whole Foods Lot"): Except for the southeastern portion of this lot, which is near single family housing, this lot is on or near Wisconsin Avenue and relatively far from single family housing. OP proposes to keep the lot medium density. Although we do not oppose that recommendation if no SAP process is initiated, we believe that if there is an SAP process, this lot, except for the southeastern portion, should be a candidate for high density residential.	01-Yes	The FLUM reflects this proposal. Additionally, the Generalized Policy Map (GPM) identifies this area for a future planning analysis for further study.
ANC 3E-4	2.14		Education Facilities	To address high demand and overcrowding in Ward 3 schools, the City should develop and implement growth and investment strategies in school programs and/or support services, in an effort to align capacity and demand and ensure convenient and excellent matter of right options in every community. Further, we note that this policy in Education supports this RCW policy as well: NEW Policy EDU-1.2.5: Facility Expansion Where additional DCPS school capacity is needed to satisfy enrollment demand and to avoid overcrowding, DCPS may need to consider existing site capacity, site acquisition, and new school development, in addition to school boundary and enrollment adjustments.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; Please see the Educational Facilities Element, Policy EDU1.1.1 Master Facility Planning, for guidance on this issue.
ANC 3E-5	2.14		FLUM	3. If OP refuses our request for a SAP, we provide comments on specific proposals below. We again note our strong preference for an SAP, however, and we provide comments below about how an SAP would enable fine tuning of density. We note that although we would expect an SAP to involve both decreases and increases of density from that currently proposed, the net change could well be increased density beyond that currently proposed.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; No FLUM integration or change needed. Can be addressed in a Future Planning Analysis.
ANC 3E-6	2.14		FLUM	4. All change in land use designation should be accompanied by policy language that indicates that any rezoning to higher density should be accomplished only through Planned Unit Developments, so that any increased density projects be architecturally sensitive to adjoining residential neighborhoods, and include appropriate community benefits, such as increased affordable housing and attractive public open spaces	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; No FLUM integration or change needed. Can be addressed in a Future Planning Analysis.
ANC 3E-7	2.14	2309.2a	Rock Creek West	ANC 3E does not believe the views from the top of the retaining wall for the reservoir in Ft Reno Park are of historical significance. The current high point in Fort Reno Park is in fact artificial and blocks the actual views from the natural high point in the park. However this has not stopped opponents of new housing along Wisconsin Avenue from claiming that this view needs to be protected. ANC 3E respectfully asks OP to completely strike 2309.2a.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The current bullet does not specific a location in Fort Reno Park for the 'conservation of the important scenic and visual resources'.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 3E-8	2.14	2309.9	Rock Creek West	<p>Policy RCW 1.2.8: Schools and Libraries Place a very high priority on the expansion, renovation and improvement of schools and libraries. The fact that a majority of the schools in this Planning Area are operating at or above capacity should be considered in DCPS facility planning..., and in the approval of any residential development that could further exacerbate school overcrowding. Changes to school service boundaries, and the expansion of existing school facilities, and/or development of additional school facilities should be aggressively pursued to ensure that school overcrowding is proactively addressed. 2309.9</p> <p>ANC 3E supports this change, but recommends adding that demand for Ward 3 schools should not be treated in isolation to the rest of the city given the large number of out of boundary students, and students who travel long distances. To address high demand and overcrowding in Ward 3 schools, the City should develop and implement growth and investment strategies in school programs and/or support services, in an effort to align capacity and demand and ensure convenient and excellent matter of right options in every community.</p>	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; Please see the Educational Facilities Element for Comprehensive Plan guidance on this issue, specifically ED-1.1 Integrated Master Planning for All Public Schools.
ANC 3E-9	2.14		Rock Creek West	BE IT FURTHER RESOLVED, ANC 3E believes that the Comp Plan process is a political process as is resolving the school overcrowding problem in Ward 3. ANC 3E believes that Ward 3 has not shouldered its fair share of the demand for additional market rate and affordable housing in the District. ANC 3E further believes that in order for additional and existing housing in Ward 3 to be desirable Ward 3 must continue to have high performing schools and in order for that to occur the DC Council must, through some combination of additional facilities and boundary revisions, resolve school overcrowding in Ward 3.	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; Please see the Educational Facilities Element for Comprehensive Plan guidance on this issue, specifically ED-1.1 Integrated Master Planning for All Public Schools.
ANC 3E-10	2.14	2154.21	FLUM	2154.21 (the "WMATA Lot"): Part of the southernmost portion of this lot adjoins relatively small apartments and condominiums in a moderate density zone, and part is diagonally across the street from low density duplexes. We believe, accordingly, that it is appropriate to step down density here from high to medium. The precise delineation of this stepdown should be determined in an SAP.	03-Acknowledged	No FLUM integration or change needed. Can be addressed in a Future Planning Analysis.
ANC 3E-11	2.14	2155.14	FLUM	2155.14 (the "Lot Behind Rodman's"): OP proposes to change this from low to moderate density. Because the lot, particularly the section behind Rodman's parking lot, is relatively far from Wisconsin Avenue and adjoins single family housing on two sides, we believe that limiting language should be added to this change to the effect that "moderate light" is most appropriate here, such as townhomes or multi unit housing that approximates townhomes in height, density, and general appearance. For avoidance of doubt, we support the proposed change of the portion of the lot closest to Wisconsin Avenue to medium density.	03-Acknowledged	No FLUM integration or change needed. Can be addressed in a Future Planning Analysis.
ANC 3E-12	2.14	2430	FLUM	2430 (the "Lot Behind the Fox 5 Building"): Like the Lot Behind Rodman's, OP proposes to change this from low to moderate density. Because the lot, is behind Wisconsin Avenue and adjoins single family housing on two sides, we believe that, like the Lot Behind Rodman's, limiting language should be added to this change to the effect that "moderate light" is most appropriate here, such as townhomes or multi unit housing that approximates townhomes in height, density, and general appearance. For avoidance of doubt, we support the proposed change of the portion of the lot closest to Wisconsin Avenue to medium density.	03-Acknowledged	No FLUM integration or change needed. Can be addressed in a Future Planning Analysis.
ANC 3E-13	2.14	2155.2	FLUM	2155.2 (the "Rome Pizza Lot"): The parking lot behind this building was not included in either proposals for FLUM changes or OP's recommendation. Accordingly, for process reasons, we do not here recommend changes to it, but note that if OP institutes an SAP, discussion should occur as to whether the parking lot's FLUM designation be changed to moderate.	03-Acknowledged	No FLUM integration or change needed. Can be addressed in a Future Planning Analysis.
ANC 3E-14	2.14	2155.5	FLUM	2155.5 (the "Maartens Lot"): The southwestern portion of this lot is behind Wisconsin Avenue and adjoins single family housing. We believe that it would be appropriate to step down some of this part of the lot to moderate density. The precise delineation of this stepdown should be determined in an SAP.	03-Acknowledged	No FLUM integration or change needed. Can be addressed in a Future Planning Analysis.

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ANC 3E-15	2.14		FLUM	2. ANC 3E believes that no Up FLUMing should be implemented until the Mayor has submitted a formal plan to address school over enrollment within our boundaries, and the Council has approved and funded such a plan. Any such plan should aim to preserve diversity in our schools.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The Future Land Use Map and Generalized Policy Map are intended to provide generalized guidance for development and conservation decisions and are considered in concert with other Comprehensive Plan policies, including those in the Educational Facilities and Community Services and Facilities Elements.
ANC 3E-16	2.14	2095	FLUM	2095 (the "Doctors and Dentist's Building"): This lot is well behind Wisconsin Avenue and adjoins single family housing. Moreover, it is the only lot in our ANC that OP proposes to Up FLUM from low density to medium density. Given these facts, we believe that OP should increase the density only from low to moderate on this lot, which will provide a step down from the large medium density lot between it and Wisconsin Avenue.	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Building step downs can be achieved through urban design strategies, as noted in the Urban Design Element Policy UD-2.2.4: Transitions in Building Intensity.