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COMMENTS AND RESOLUTION REGARDING DRAFT COMPREHENSIVE PLAN UPDATE

January 21, 2020

1. Introduction

ANC 3F solicited the comments of its committees and the community regarding the Draft Comprehensive Plan that was released for comment on October 15, 2019. The comments presented in this resolution are the comments received in response as well as comments from the individual Commissioners of ANC 3F.

This document is organized into the following sections:

1. Introduction
2. Rock Creek West Area Element Comments and Recommendations
3. Future Use Land Map Comments and Recommendations
4. Housing Element Comments and Recommendations
5. Educational Facilities Element Comments and Recommendations
6. Urban Design Element Comments and Recommendations
7. Economic Development Element Comments and Recommendations
8. Resolution

2. Rock Creek West Area Element Comments and Recommendations

ANC3F strongly supports the increased density as depicted in the Plan.

Paragraph 2308.7 (Policy RCW-1.1.6: Metro Station Areas)

ANC3F recommends the following edit to the phrase “Design context-specific transitions to be more aesthetically pleasing” should have the phrase “and meet Gold LEED standards” inserted into it prior to “from development along the avenues...”

3. Future Use Land Map Comments and Recommendations

ANC3F strongly supports amendment 2123 which calls for an increase in density between Porter Street and Macomb Street along Connecticut Ave. While this area is outside of 3F, it is immediately adjacent to 3F and is heavily used by our constituents.

ANC3F recommends the following amendments to the Future Use Land Map:

Address	Current FLUM Designation	Proposed FLUM Amendment
5020-5030 Connecticut Ave.	Commercial Low Density	Mixed Use, Medium Residential/Commercial up to 70'
5101-5109 Connecticut Ave.	Residential Moderate Density	Medium Residential up to 70'
5039 Connecticut Ave.	Commercial Low Density	Mixed Use, Medium Residential/Commercial up to 70'
5001 and 5013 Connecticut Ave.	Commercial Low Density	Mixed Use, Medium Residential/Commercial up to 50'

4. Housing Element Comments and Recommendations

Overview

The plan impacts ANC3F neighborhoods most immediately in terms of new residents moving into the existing large rental buildings in the Connecticut Avenue corridor between Porter St. and Nebraska Avenue, with the main concentration between Van Ness and Davenport Streets.

The implementation of the Mayor's Housing Equity plan has resulted in issues in ANC3F which were not anticipated. Among these issues are an increase in Metropolitan Police Department (MPD) activity, concerns about safety and security, and the deterioration of living standards in some buildings along the Connecticut Avenue corridor and in certain neighborhoods.

ANC 3F is concerned about the way that buildings and neighborhoods are being impacted and wish to foster harmonious communities in which balance and fairness work for everyone. The Mayor's initiative to rid the District of substandard housing and homelessness, and the effort to preserve affordable housing are currently in conflict with each other.

When a voucher holder moves into a subsidized unit, it removes from the market affordable housing for a low-income or very-low-income conventional renter. A conventional renter is defined as a renter who does not use, assistance, vouchers or housing subsidies. The Office of Planning (OP) should give further thought to how these two essential initiatives can successfully work together, and ANC3F urges OP to take a hard look at the legislation being considered by the DC Council's Committee on Housing and Neighborhood Revitalization, including increasing funding for construction of transitional /supportive/ intermediate Housing and the conversion or adaptation of existing buildings for voucher applicants whom Department of Human Services (DHS) assesses as unready for independent housing.

Comments on Specific Sections of the Housing Element

Paragraph 516.11(Policy H-4.2.51: Ending Homelessness)

ANC3F supports the development of permanent subsidized housing for the homeless in all planning areas of the city.

Paragraph 516.17 (Homeward DC)

Terminology needs to be clarified. "Supportive housing" apparently is different from "permanent supportive housing." Is "supportive housing" the same thing as assisted or transitional housing?

The supportive housing discussion is weakly presented as there is a lack of clarity on the terminology. This paragraph does not give the number of supportive housing units that the city aims to provide. That is assuming that supportive housing is not the same thing as "permanent supportive housing."

What are the numbers of "supportive housing" or transitional housing units that the Plan aims to provide? For "permanent supportive housing," clear target of 2,000 units is provided.

If "supportive housing" is the same as the "permanent supportive housing," then we ask: how many transitional housing units does the Plan target for production? How many units of transitional housing currently exist? Where are the transitional housing units located?

Policy H-4.2.3 (Increasing the Supportive Housing Supply)

The Plan needs to distinguish very clearly between "supportive housing" and "permanent supportive housing," if a distinction is being made. Permanent subsidized housing" is the crux: ANC3F agrees in principle, but not as the concept is presently implemented. We hope that there will be no increase in the number of permanent supportive housing units until and unless DHS reforms its voucher program.

NEW Policy H-4.2.5 (Reducing Housing Barriers for Persons Experiencing Homelessness)

The language here is inadequate, since in many cases what constitutes a barrier to homeless individuals and families in finding affordable and supportive housing is that landlords may be leery of voucher programs that are being administered without accountability and/or being mismanaged both in terms of those to whom vouchers are given (in a number of cases, people who've been assessed as unready to live

independently have received vouchers anyway) and in terms of how they're supported after they receive vouchers.

In addition, the question of "incentives to landlords" begs to be revisited. There is already a current subsidy (windfall) to landlords of up to 175% and even 187% of the fair market rental rates in our area.

Policy 4.3.5 (Returning Citizens)

ANC3F lauds the goal of the Department of Corrections and the Mayor's Office on Returning Citizens to ease re-entry while working to reduce recidivism and maintain public safety. What will ensure the city keeps the commitments it makes in the Comprehensive Plan to "ensure public safety?"

There was a notable case in 2019 whereby a voucher resident at Sedgewick Gardens threatened police and neighbors alike. The individual subsequently moved to The Brandywine building a few blocks north on Connecticut Avenue. The individual was then incarcerated after another violent incident.

ANC3F feels that care should be taken so that returning citizens are not concentrated into existing housing, and that they should be spread more evenly.

ANC3F is a welcoming community who wishes to be a good partner. We are looking for the assurance that the city will provide the services and resources necessary to us and the community that enable us to be successful in this effort.

Policy H-4.3.6 (Behavioral Health Issues)

ANC3F agrees that to ensure public safety "steps should be taken to prevent the eviction of mentally ill persons from publicly financed housing so long as they are following the rules of tenancy." Furthermore, ANC3F supports "the production of housing for people with mental illness through capital and operating subsidies."

ANC3F also strongly agrees that there is a need to "improve the availability and coordination of such housing with wrap-around mental health and other human services, and to ensure that each individual's housing is maintained if and when they need to be hospitalized."

However, ANC3F also feels that the language around this issue is weak in the Comprehensive Plan. How much housing for the mentally ill does the city plan to produce? What kind of housing is needed? How does the city plan to "improve the availability of such housing?"

Paragraph New Unnumbered (Persons with Behavioral Health Issues)

Case managers routinely do not visit their clients, and “ongoing counseling” could perhaps be helpful if the people who needed it were required to have the necessary counselling. The goals of the Comprehensive Plan cannot be met if the city does not address what is not working now.

Policy H-4.3.1 (Short-Term and Emergency Housing Options)

Drug and alcohol substance abusers are not currently receiving “harm-reduction” treatment. Individuals are simply allowed to continue in the same damaging path they were on when they were homeless. That pattern is consistent with national studies of the lack of harm-reduction goals in the way voucher programs across the country are implemented.

See “Housing First and harm reduction: a rapid review and document analysis of the US and Canadian open-access literature,” published in 2017 in PubMed Central.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5442650/>

5. Educational Facilities Element Comments and Recommendations

ANC3F recommends more focus on the impact of increased residents on schools with pedestrian and vehicular traffic, crosswalk safety and crowding now already impacting our area. The definition of schools should be expanded to include alternative type of schools that can potentially help alleviate some of these concerns.

Paragraph 1200.2

ANC3F recommends restoration of the deleted bulleted sentence that reads as follows: “Modernizing the District’s public schools to provide a safe and stimulating learning environment for District students.”

ANC3F recommends the following additional phrase “and greater actualization of ties between the University of the District of Columbia and the Van Ness neighborhoods.” to the phrase engaging Washington, DC’s universities as innovation centers and as potential activators for large site development and as good neighbors that are compatible with surrounding neighborhoods through the use of a campus plan.”

