

Approved  
12/3/19

## **ANC 4A Resolution r4a19-12-03-01 ANC COMMENTS / COMP PLAN**

ANC 4A received a copy of the proposed revision of the Comprehensive Plan in November of 2019. We were told that comments may be submitted from the public until December 20, 2019, and from the ANCs until January 31, 2020.

We share the interest in seeking more time to consider these matters, but there is no guarantee that more time will be given. It is prudent for us to come to a consensus to the extent feasible and then to submit a letter, with ANC 4A's comments to the Mayor, the Director of the Office of Planning, and the DC Council.

In order not to lose the opportunity to comment, we are offering the attached comments for your consideration and approval at this December 3, 2019 meeting. We will also consider alternative comments.

The Comprehensive Plan encompasses two tiers of city planning: 1) the City-wide Elements, and 2) the Area Elements. In addition, the Future Land Use Map ("FLUM") and the Generalized Policy Map ("GPM") express the public policy on future land uses in the District and shows the residential and commercial areas.

In 2017, the Office of Planning (OP) opened the process to amend the 2006 Comprehensive Plan. In response, ANC 4A offered Resolution expressing our views on the plan. We have not received feedback as to whether the ANC's recommendations were adopted. We know that the Framework Element was amended and approved by the Council on October 8, 2019.

On October 15, 2019, the Office of Planning published the proposed amendments to the 13 Citywide Elements and the 10 Area Elements. The compilation is more than 1,500 pages. Of proposed changes, as well as nearly 200 proposed changes to the FLUM and the GPM maps. The proposed amendments make major changes to the existing elements, striking out large portions of text and replacing the text with new language.

OP has allowed the public a 65-day review period that began on October 5, 2019. The Advisory Neighborhood Commissions were told that we had until January 31, 2020 to submit comments. This review period falls within the Thanksgiving, Christmas, New Year's and other religious holidays.

We are asking for more time. This should be granted, because we have been advised that it is not likely that the Council will ~~not~~ consider these proposed amendments until after the passage of the District's Fiscal Year 2021 budget, estimated to be after June 2020.

We incorporate by reference ANC 4A's previous resolution. Our comments also reference and support the requests submitted through ANC 4A, including from the Shepherd Park Citizens Association.

We now offer comments on the revised draft that was released on October 15, 2019. This matter will be considered at the ANC 4A regular public meeting on Tuesday, December 3, 2019.

Our proposed comments focus primarily on Land Use, Housing, Transportation, the Environment, Historic Preservation, the Rock Creek East Area element, and the Implementation Action Steps and the Future land Use Map. Time did not allow us to address the other elements like Infrastructure, the Education element, the Community Facilities, Urban Design or the Arts, but there is strong interest in those sections as well.

At the ANC 4A meeting, an oral resolution will be offered that the ANC 4A provide comments to the Office of Planning (as approved) and authorize the Chair of ANC 4A to send a letter and the comments as may be agreed to, and adopted at, the December 3, 2019 public ANC 4A meeting to the Mayor, and the Office of Planning.

Therefore, we are providing the attached comments for your consideration. I am also sharing an excerpt from the testimony that I gave at the marathon hearing on this matter on March 20, 2018, along with the draft comments.

Section Reference	Topic	Comment
Future Land Use Map	Land use along 16th Street	Amend the Future Land Use Map to provide for Moderate Density Residential (RMOD) on 16th Street from Arkansas Ave. NW to Military Rd. NW. (Note: ANC 4A does not adopt this recommendation, but it is included, because it was suggested by one of team participants.)
<b>300</b>	<b>LAND USE</b>	
LU-1.3.3a	Affordable Rentals & Multi-family sales & rentals	We support the district's efforts to ensure housing near Metro stations and bus corridors is affordable
306.6	Premium transit corridors	Confirm in the text that "premium transit corridors" include bus corridors.
307	Infill Development	Must match current use – which appears to be the intent – but this should be very clearly stated.
309	Neighborhoods	Must protect and respect existing neighborhoods.
309.4	Suggests all should be a mix of home and commercial	This should be clarified, as not all neighborhoods are large enough to allow mix of residential and commercial, and Crestwood, Colonial Village, and North Portal Estates appear to be such neighborhoods.
309.5	Variety of Neighborhoods	Striking "single-family" should be reversed, or at least clarified, to be clear that the plan supports the ongoing existence of single family neighborhoods.
309.7	Neighborhood Revitalization	"Equity and opportunity for disadvantaged persons" should be part of any

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*added  
Shepherd Park  
Brightwood  
North Street  
Hazel*

		consideration, but it should not dominate all other community elements, as the issue should be equity and opportunity for all citizens.
309.8	C,E&R Neighborhoods	The goal should be to PROTECT and respect, not just respect, as it is a lower standard. Residents as taxpayers participate in helping the city meet objectives such as placement of "affordable housing" in the city.
309.10	Neighborhoods	This should be explicit in stating "single family neighborhoods" as opposed to the elimination of those words.
309.11 / LU-2.1.6	Tear-Downs and "Mansionization"	We support the policy to discourage the replacement of quality homes in "good physical condition" with larger ones that will use more energy.
309.12	Row House Neighborhoods	The goal should be to PROTECT and respect, not just respect, as it is a lower standard.
309.13	Zoning	Central planning should not be allowed to eliminate low and moderate density neighborhoods without assured heavy involvement of the residents of the affected neighborhoods. The new language is very undesirable, "except along premium transit corridors".
309.14	Alterations	Support intent to discourage alterations that result in a loss of family-sized units.

310.8	Alley greening	Add the language in <b>bold</b> : “Support the greening of residential alleys where feasible, <b>and especially in neighborhoods adjacent to Rock Creek Park</b> , to enhance sustainability and stormwater management.”
316	Foreign Missions	Appears to need no comment.
317	Group Homes	Was this eliminated?
400	<b>TRANSPORTATION</b>	
400.6	Technology and Innovation	The sections give no recognition to the needs of a growing elderly population that cannot or does not use the services and technologies being described in only glowing terms.
Action Item T-1.1.A	Transportation Measures of Effectiveness	Strike the language, ‘Implement moveDC performance measures and the District Mobility Project to quantify transportation service and assess land use. ‘ Further consideration is needed to ensure that the proposed performance measures meet our needs and are consistent with FWHA rules since we rely on federal funding for many of our projects.
	Transportation Goal	Add “efficient and reliable.” It is not just about safety.
403.5	Autonomous Vehicles	What are “compact and accessible development patterns”?
403.6	Measuring Traffic Impact	Moving beyond a car only measure is the purpose of elimination of the old grading system. But what will be the

		new measure if we no longer use the grading system?
404	Transforming Corridors	This proposal relies on “moveDC” as the rule setter – thus our comment may not be relevant, but we question whether these changes are legally compliant or in the public interest.
T-1.4	“Placemaking” in the Public Space Program within DDOT	Clarification is requested regarding T-1.4. Any “enhancement” within the “public rights of way” are supposed to be consistent with the official dedicated public purpose and should effectuate that purpose. Any changes should follow the process to close or convert the public space. Allowing commercial entities to take away public space should be reviewed. What does “open street” mean? For dedicated bus lanes, will the buses be permitted sole access or will it be a mixed-use situation?
T-2.3C	Performance Measures	If equity and fairness is important and if DC is to be an age-friendly, family-friendly city, the transportation performance measures should apply to all modes of transportation – not just walking and bicycle transportation.
405	Regional Smart Growth	Coordination is recommended
405.5	Deleted	Keep the paragraph as it explains Figure 4.1
407	Transit Accessibility	Keep water taxis

409	Bicycles	Relies on “moveDC” and repeats several times that DC should add more dedicated bike lanes, but where?
410.2	Sidewalks	It <u>should not be required</u> that sidewalks be installed in “single family neighborhoods”
410.10 / T-2.4B	Sidewalks	This would require the installation of sidewalks throughout the District. We have been requesting the installation of 2 blocks of sidewalks for 2 years (on Blagden Avenue and Mathewson Drive in 4A08) and the city has been unable to do that. We also have issues with sidewalk upkeep. It does not seem like a good expenditure to insist on sidewalks, especially where the ANCs have not requested them. Give priority to adding sidewalks where they have been requested. Don’t pave needlessly. Use our limited funds for other transportation needs.
T-2.5	Roadway System and Auto Movement Maintenance Funds	We support providing sufficient funding sources to maintain and repair (and keep open) the District’s system of streets, alleys, bridges, sidewalks and bike lanes. We think that transportation funds should be used for public transportation purposes.
	Functional Classification Plan	Until such time as the Highway Plan is replaced, DC should comply with the plan.

500	<b>HOUSING</b>	
500.18		The presumption of a decline in families should not be generalized as it is, since in neighborhoods like Crestwood, it is not accurate. As the plan notes, it is necessary to maintain capacity for large families.
H-1.2.J	Establish Affordability Goals	We support establishing affordability goals by Area Element. The ANCs may be able to assist with this.
H-1.3C	Technical Assistance	We support Technical Assistance for Condominiums and Cooperatives
H-1.3.1	Housing for Larger Households	We recognize the need for housing that supports larger household and the fact that larger households may include extended family members, family groups and / or caregivers.
	Shepherd Park's request for downzoning	ANC 4A incorporates by reference its support of the request made by Mark Pattison, then President of the Shepherd Park Citizens Association, for changes to the zoning of specific lots in Shepherd Park in 2017.
H-1.5B	Changes to the Zoning Regs.	We support the changes to the zoning regulations in accordance with the resolution passed by ANC 4A. We recommend that the city provide guidance to residents on how we can lawfully have an accessory unit (also called granny flats or in-law suites) consistent with our neighborhoods.



H-2.1-A	Rehabilitation Grant	We support the maintenance of a rehabilitation grant program for owners of small residential units, that will link the grants to income limits for future tenants. This should not be restricted just to apartment building owners.
H-2.1.1	Track Displacement	We agree that the City should track displacement and neighborhood change so that we may be able to help residents stay in DC, if they want to.
H-2-1.6	Rent Control	Rent control should be perpetual and not expire. DC should consider whether all buildings should be subject to rent control, including those built after 1975
H-2.2.2	Housing Stock Maintenance	Support
H-2.2.3	Tax Relief	Support. As the goal is to help residents and seniors maintain their homes and prevent displacement, we urge the OP to consider creating Neighborhood Tax Increment Financing (TIFs), which could leverage grants for low-income families and seniors for repair to their properties.
H-4.2	Ending Homelessness	We support the policies and efforts to end homelessness
<b>600</b>	<b>ENVIRONMENT</b>	
E-2.2A	Pollution Abatement	Add "Rock Creek and Piney Branch Creek" to the list. We have a serious source of pollution that the City has ignored, with 29 storm sewer overflows that were

		supposed to be addressed at the same time as the Anacostia River contamination was addressed.
E-3.2.1	Solar Easements	We support.
E-3.3A	Recycling Program	We support.
E-5.2C	Enforcement	We support the maintenance of a water pollution control program that implements and enforces the water quality standards, including those impacting Rock Creek East (like Rock Creek and Piney Branch Creek).
E-5.2.E	TMDL Implementation	We support enforcing the Total Maximum Daily Load.
<b>1000</b>	<b>HISTORIC PRESERVATION</b>	
HP 1.4	Evaluating Historic Significance	We support this proposed action.
HP2.1.A & HP2.1.B	Historic Places	We support protecting and preserving the historic places of Washington.
HP-2.2.A	Historic Landscape	We support harmonizing and protecting the important vistas of DC
HP-2.2C	Protecting Rights of Way	We support the proposal to preserve the original street pattern in historic districts by maintaining public rights of way and historic building setbacks.
HP-2.2.d	Historic Avenue Landscapes	We support this policy.
<b>2200</b>	<b>Rock Creek East Planning Area</b>	
Small Area Plans		ANC 4A may offer, at a later time, a small area plan to protect the existing single-family low density housing stock in our area.

RE-1.2.B	Historic Resource Recognition	We support the proposal to document the places of potential historic significance in the Rock Creek East Planning Area, along with those already receiving historic recognition.
RCE-2.8.A	Walter Reed	We support the Land Use and Zoning Changes to the Future Land Use Map and Generalized Policy Map designation and established zoning for the Walter Reed site pursuant to the proposed Comprehensive Plan Land Use designations map in the Walter Reed Small Area Plan. We recognize that there is another ongoing plan that pertains to the State Department side of Walter Reed.
RCE-2.8C	Aspen Street Widening	We need more information regarding the proposed plan and whether there will continue to be one travel lane in each direction and the impact to the residences along Aspen Street, NW
	Transportation Demand Management (TDM) Plan	We recognize the need to create a Transportation Demand Management Plan and to implement the TDM for the former Walter Reed site. ANC 4A needs more information before we can offer comments on the transportation plan.

Testimony of Gale Black, Before the DC Council Committee of the Whole on the Proposed Framework for the Comprehensive Plan, March 20, 2018

1. We need to protect our limited low density single family housing stock if we want to meet the needs of DC. This plan could lead to the loss of our residential green spaces and churches, because there is an incentive to increase density, through new development, and conversions that build up and out.
2. The plan, as proposed, does not guarantee affordable housing. It does the opposite. It is not even clear what “affordable” means.
3. DC was built and sustained on several historic Master Plans. It is in the public’s interest to retain our historic character, functions, and scale.
4. The concept of “mixed-use” needs to be revisited. It is contrary to the vision for DC and our interest in preserving stable resilient neighborhoods
5. This process has not been transparent. ANC 4A passed a resolution in 2017, in opposition to the proposed Framework Element, because of the wholesale changing of the Comprehensive Plan. OP has not addressed the comments.
6. If “equity” is truly important, there must be one set of laws for everyone, not special privileges for some, over others. Not everyone wants to bike. If fairness is important and diversity is valued, we need to consider DC’s unique needs and have a plan that works for all of us, including older adults, individuals with disabilities, families, those below the poverty line, visitors, and for small businesses.

**The Land Use Element is very important.** More than any other part of the Comprehensive Plan, the Land Use Element lays out the policies through which the city will accommodate growth and change, while conserving and enhancing its neighborhoods 3-1. We don’t need to CREATE new neighborhoods. We need to **maintain the successful neighborhoods.** Guiding Principles 2-24.

We hope to keep strong protections for existing residential communities. For stable neighborhoods, the 2006 plan emphasized neighborhood conservation and appropriate infill. Land use policies in those areas focused on retaining neighborhood character. This new plan focuses on **increasing density** and **Creating New Neighborhoods**, but in ways that are not equitable or affordable for the majority. It seeks to replace our street network.

The District has benefitted from a legacy of far-sighted master plans that recognize the importance of parks and open spaces to the future of the city. The city is built on the historic L’Enfant and McMillan Plans which are the foundations of modern Washington, according the National Capital Planning Commission Federal Elements. The L’Enfant Plan’s streets and place - - and their extension by the 1983 Permanent System of Highways - - as well as the 1901 McMillan Plan and the 1910

Height of Buildings Act, have directed the character and orderly development of the city, according to the NCPC, federal elements at page 157. There was a place for everything and everyone. The horses did not share the path with the pedestrians. That worked. Now, everything is “mixed-use” and not nearly as safe. Now, we have scooters, sharing the public roads and sidewalks.

Washington has no fewer than 130 distinct and identifiable neighborhoods. “They range from high-density urban mixed use communities,” like the West End and Mount Vernon Square to quiet low density neighborhoods like Crestwood, Colonial Village, Hillcrest and Spring Valley, providing a wide range of choices for the District’s many different types of households. Page 3-23. The 1999 Comprehensive Plan identified the then staple neighborhoods in Ward 4. The list included Rock Creek East, Carter Barron East, and Lamond-Riggs. Those names don’t appear on any maps today. Long ago, the city recognized that Colonial Village, North Portal Estates and Crestwood should be “clustered” together for planning purposes. Section 1503.3(b) stated that “Crestwood, Colonial Village and North Portal Estates are affluent neighborhoods bordering Rock Creek Park, They are developed with single-family detached homes on relatively large lots. These quiet neighborhoods are characterized by curving non-through streets and cul-de-sacs. Because the park is a natural barrier, access to these neighborhoods is limited, traffic is restricted, and open space is abundant.” It recognized that there were many well-known neighborhoods, such as Crestwood, Shepherd Park, Colonial Village, North Portal Estates and 16<sup>th</sup> Street Heights. “Each neighborhood is unique in demographic, social, economic and housing characteristics. They contain a diverse mix of housing types that will accommodate a variety of income ranges.” We need to preserve that mix of options. We need to protect all of our neighborhoods, and not overlook protecting Brightwood. **There are 85 development projects planned for the Rock Creek East Area.** Where are they? Will they be affordable?

**We need to remember that there is only so much land, time, or money.**

**DC is small. It is only 69 square miles; and DC is already dense.** In 2016, the District had over 11,000 people per square mile. Population density is even higher if the federal lands are subtracted out. Federal lands comprise almost 40% of the land in the District. Currently, only 23% of the land is permanent, open green space, like Rock Creek Park and the National Mall.

Only 28.1% of our land is residential. Only 13% is single family, low density, non-commercial.

**Let's recognize that DC is unique; and its city plan should be responsive to DC's unique needs.**

It's the Nation's Capital.

DC is an international city.

DC is historic.

DC is unique because of the federal presence that accounts for 40% of our land.

The city also attracts 19 million visitors annually.

We have 169 or more foreign diplomatic missions.

We have 23 international organizations.

We have many large employers, which include the federal government, universities, hospitals and 130 unique neighborhoods.

20% of the population is below the poverty level.

Approximately 8,000 residents are homeless (and many of these are the working poor).

**DC has many challenges.**

For one thing, Seventeen jurisdictions feed into DC. Most of the people who work here commute here from outside of DC. The road network is already overcapacity. We need to consider a viable rail option. This plan does not do that. Sixteenth Street, NW is one of the few evacuation routes in our quadrant. At no point does the city explain how it is to operate to move people or goods efficiently or effectively along this corridor.

We are also struggling now with our infrastructure needs, as reflected by black-outs, road cave-ins, sink holes, water main breaks, and delays in restoration of use of our existing public roads and public rights-of-way.

## **BIG CHALLENGE**

### **TRANSPORTATION SAFETY AND EFFICIENCY FOR ALL OF US**

By contrast, in just 6 years, the bike share program has grown to almost 450 stations and 3700 bikes across DC. We now also have dock less bikes, competing for our public transportation rights of way.