



Government of the District of Columbia Advisory Neighborhood Commission 4B

RESOLUTION #4B-20-0104

Providing Feedback on Proposed Changes to the Comprehensive Plan Adopted January 27, 2020

Advisory Neighborhood Commission 4B (ANC 4B or Commission) takes note of the following:

- The Comprehensive Plan is a 20-year framework and guiding document for the future planning and development of Washington, DC. As noted by the District’s Office of Planning, “the [Comprehensive Plan] establishes a vision and broad goals to help inform decision-making and provide context for residents, officials, and stakeholders and can help guide and inform more fine-grained planning efforts.” District Office of Planning, [“The Comprehensive Plan: A Brief Overview”](#) (updated Dec. 17, 2019).
- The Comprehensive Plan includes several Elements, including Area Elements that relate to specific geographic areas of the city (such as Rock Creek East, which includes several policy focus areas within the Commission’s geographic boundaries); Context Elements that provide introductory, overarching principles; and Citywide Elements (such as housing, transportation, historic preservation, and educational facilities, among others). *See id.*
- The Comprehensive Plan was written in 2006 and amended in 2011. The District’s Office of Planning began an effort to amend the Plan a second time in 2016, with the DC Council approving the Framework Element in October 2019. The Office of Planning launched public review of the remainder of the Comprehensive Plan on October 15, 2019, and will accept feedback from Advisory Neighborhood Commissioners until February 14, 2020.

Following substantial community engagement, Advisory Neighborhood Commission 4B provides the following feedback on the Office of Planning’s proposed amendments to the Comprehensive Plan, focused specifically on Elements related to areas within or adjacent to the Commission’s geographic boundaries and subject matter Elements of particular relevance to the Commission’s work, including (1) the Rock Creek East Area Element; (2) the Housing Element; (3) the Transportation Element; (4) the Historic Preservation

Element; (5) the Educational Facilities Element; and (6) the Future Land Use Map.

1. The **Rock Creek East Area Element** provides a general overview of the area (including information regarding the area's history, land use, demographics, housing characteristics, income and employment, and growth projections); general policies and actions to guide growth and neighborhood conservation decisions; and five policy focus areas within or adjacent to Advisory Neighborhood Commission 4B (Takoma Central District; Upper Georgia Avenue; Kennedy Street, NW; Riggs Road and South Dakota Avenue; and the Former Walter Reed Army Medical Center Site). The Commission provides the following feedback on the Rock Creek East Area Element:

- **Include Affordable Housing, Including Deeply Affordable Housing, as a Neighborhood Priority:** The Commission believes that housing is a human right and that inclusive and diverse neighborhoods benefit all District residents. As such, affordable housing (including and with an emphasis on deeply affordable housing) should be included as a major planning objective and neighborhood priority, and revisions to the Comprehensive Plan should reflect this priority. *See, e.g.,* 2200.2 (listing conservation of neighborhood traits as major planning objective); 2200.9 (emphasizing residential character and conservation of neighborhoods).
- **Include Data on Affordable Housing Within the Area:** The Commission appreciates the inclusion of data regarding demographics, housing characteristics, and income and employment of residents within the Rock Creek East Area, but also believes data on dedicated affordable housing (including public housing), as well as rent controlled apartments, and a detailed analysis of median income within the Area as related to dedicated affordable housing would better allow the city to track the percentage of affordable housing as related to market rate housing within the Area, as well as inform the city's processes to ensure sufficient housing at all necessary affordability levels. *See, e.g.,* 2204.2 (providing details on home ownership and rental rates); 2205.2 (providing details on median household income).
- **Define Affordable Housing to Include Deeply Affordable Housing:** The Commission appreciates additional proposed language regarding affordable housing within the Rock Creek East Area Element and other portions of the Comprehensive Plan but believes that a phrase that can apply to housing serving households earning less than 30 percent of the Median Family Income all the way to households earning less than 80 percent of the Median Family Income is amorphous and fails to provide clear policy and decision-making guidance, and may result in the under-production and under-preservation of deeply affordable

housing. A specific definition of affordable housing is required and should include deeply affordable housing for households earning less than 30 percent of the Median Family Income. *See, e.g.*, 2208.4, Policy RCE-1.1.3: Directing Growth; 2211.8, Policy RCE-2.1.3: Takoma Central District Housing Strategy; Policy RCE: Upper Georgia Avenue Development; 2214.5, Policy RCE-2.4.2: Housing along Kennedy Street.

- **Define New Housing to Include a Preference for a Mix of Housing Types:** The Commission appreciates additional references to housing for a range of ages, household sizes, and mix of incomes, *see, e.g.*, 2208.4, Policy RCE-1.1.3: Directing Growth; 2208.6, Policy RE-1.1.5: Housing Renovation; 2208.7, Policy RE-1.1.6: Development of New Housing, and believes that references to “new housing” and “new housing opportunities” should also mention expressly a preference for a mix of types of housing by age, size, and income. *See, e.g.*, 2200.7; 2208.2, Policy RE-1.1.1: Strengthening Lower Density Neighborhoods; 2208.3, Policy RCE-1.1.2: Design Compatibility; 2213.9, Policy RCE-2.3.3: Walter Reed Development.
- **Include Universal Language that Housing Remain Affordable:** The Commission appreciates proposed language that “housing remain[] affordable for current and future residents with a range of ages and household sizes” and believes this is a universal principle that should not just apply as related to housing renovation. 2208.6, Policy RCE-1.1.5: Housing Renovation.
- **Maximize Affordability on District-Owned Land:** The Commission believes the District should take every action possible to maintain ownership of and maximize affordable housing, including deeply affordable housing, on District-owned or other publicly-owned land. *See, e.g.*, 2208.7, Policy RCE-1.1.6: Development of New Housing (encouraging mixed-income housing on District-owned land); 2211.7, Policy RCE-2.1.2: Strategic Public and Private Investment in Takoma (discussing development of key public properties); Housing Element, 500.2 (noting requirement that District-owned land sold for housing include 20–30 percent affordable units); ANC 4B Resolution #4B-19-1004, [“Calling on DC Housing Authority to Preserve Public Housing and Protect Public Housing Residents”](#) (Oct. 28, 2019); ANC 4B Resolution #4B-19-0506, [“Supporting Funding for Urgent Public Housing Repairs and Calling for Commitment to Maintain Public Housing Stock”](#) (May 20, 2019).
- **Recognize Cross-Jurisdictional Coordination on Retail & Traffic Strategies:** The Commission recognizes the importance of cross-jurisdictional coordination with Takoma Park, Maryland within the Takoma Central District and encourages cross-jurisdictional review

and consideration of the Takoma Central District's retail strategy and transportation strategy, including with regard to traffic management, transit, parking, pedestrian safety, and wayfinding. *See, e.g.*, 2208.8, Policy RCE-1.1.7: Cross Jurisdictional Coordination; 2211.9, Policy RCE-2.1.4: Takoma Central District Retail Strategy; 2211.10, Policy RCE-2.1.5: Takoma Central District Transportation Strategy; 2211.11, Action RCE-2.1.A: Traffic Congestion and Parking; 2211.12, Action RCE-2.1.B: Pedestrian Safety and Connections.

- **Recognize the Value of Long-Time Non-Profit Organizations & Service Providers:** While many Comprehensive Plan provisions recognize the value of a diverse and thriving small business community, *see, e.g.*, Policy RCE: Vibrant Local Shopping Streets; 2209.6, Policy RCE-1.2.6: Small and Local Businesses; Action RCE: Retail Strategies for Upper Georgia Avenue, the Commission believes the Plan should also recognize the value of long-time non-profit organizations and service providers. These service providers struggle with the same or similar pressures as other local institutions and small businesses. The Comprehensive Plan should recognize the value of these institutions, express a desire to preserve them, and encourage the exploration of ways to keep them in our communities.
- **Recognize Need to Improve Traffic Flow at Chillum Place & Kansas Avenue:** The Commission believes the “Chillum Place/Kansas Avenue intersection” should be added to the list of priority locations for improved traffic flow and safety under 2208.17, Action RCE-1.1.D: Improving Traffic Flow. The establishment and continued growth of five different public charter schools in this corridor (see the Commission’s recommendations for the Education Facilities Element below), combined with growing commuter traffic, has contributed to significant infrastructure and safety challenges.
- **Focus on Reducing Railroad Barriers:** The Commission requests the addition of a new policy item under 2208, RCE-1.1 Guiding Growth and Neighborhood Conservation, that specifically recognizes the challenges presented by the presence of the CSX/Metrorail corridor and plans to enhance or upgrade railroad overpasses and underpasses throughout Rock Creek East. This corridor divides significant portions of the Lamond-Riggs, Manor Park, and Takoma neighborhoods. More work needs to be done to improve the visual aesthetics of these areas, ensure the continuity of our neighborhoods, and enhance the comfort and safety of pedestrians and bicyclists.
- **Improve Planning for Areas Designated for Production, Distribution, & Repair (PDR):** The Commission appreciates prioritizing the provision of buffering for Rock Creek East’s industrial zones, included under 2208.9, Policy RCE-1.1.8: Industrial Zone

Buffering. The Commission also notes that the Economic Development element of the Comprehensive Plan continues to include preservation of PDR areas as a stated goal (See 711.2 and 711.5, Policy ED-2.5.1: Retain and Transform Areas for Production, Distribution and Repair). While the creation and preservation of quality PDR jobs is laudable, market pressures are pushing many of these areas to gradually transition to non-PDR uses (and this tension is further illustrated by new text proposed under 1203.7, Policy EDU-1.1.4: Administrative and Maintenance Facilities, which acknowledges that population growth is pushing some educational facilities to move into PDR areas and the conflicts that can ensue). By focusing only on preserving PDR-zoned areas, the District is effectively choosing not to provide adequate long-term strategic planning or vision for the future of this portion of our community – which within ANC 4B is located along some portions of the CSX/Metrorail corridor. Along Chillum Place in the Lamond neighborhood, for example, this is resulting in the creation of a patchwork where some properties are being utilized for public charter schools, others are inquiring about variances to allow residential development, and demand for new commercial/industrial space appears tepid – and the new uses then find themselves awkwardly interspersed between remaining PDR businesses like auto repair shops and trucking companies. The lack of a coherent strategy is further exemplified by Future Land Use Map Amendment #1359, which appears to be a one-off use change (requested by a prominent DC developer) for an area that is currently PDR-zoned to a future use that allows mixed medium-density residential and low-density commercial. ANC 4B strongly requests the Office of Planning include a new policy item under 2208 that provides a thoughtful and realistic vision for the future of our PDR-zoned areas.

- **Provide High-Quality Transit to Our Neighborhoods:** The Commission believes that there is no substitute for high-quality transit service that provides safe, reliable, frequent, affordable, accessible, and efficient connections to jobs, schools, services, and recreation throughout the region. This should include an emphasis on government-provided service and not treat ride-hail services as an acceptable substitute for true public transit. See 2208.12, Policy RCE-1.1.11: Transit Improvements. The Upper Georgia Avenue policy focus area should emphasize that street’s importance as a high-quality transit corridor and the need for continued enhancement for transit service to ensure that the traffic effects of planned-for development at both the (proposed) Northern Gateway and Walter Reed sites are mitigated. See 2213.3; 2213.8, Policy RCE-2.3.2: Pedestrian and Transit Improvements to Upper Georgia Avenue; ANC 4B Resolution #4B-19-0504, “[Supporting Implementation of Bus Only Lanes Along Georgia Avenue Northwest](#)” (May 20, 2019); ANC 4B Resolution #4B-

19-0304 “[Supporting Increased Metrorail Service to Takoma and Fort Totten Station](#)” (Mar. 25, 2019).

- **Plan for Completion of Metropolitan Branch Trail:** The Metropolitan Branch Trail is a long-planned and long-overdue essential transportation link that will serve the length of the Commission. The language in the Plan should explicitly plan for completion of the Trail and integrate it into planning for the broader neighborhood, including planning for ways the Trail can be an asset for the community beyond transportation (*e.g.*, placemaking and economic growth).
 - **Clearly Define Goals for Gateway Elements:** The Commission believes that language related to gateway areas, particularly around Georgia and Eastern Avenue, NW, is vague and ill-defined. Planning for those areas should have clearly defined goals that reflect our priorities – including the production of affordable housing, including deeply affordable housing. *See* 2213.3; 2208.8, Policy RCE-1.1.7: Cross Jurisdictional Coordination.
 - **Support Positive Vision for Walter Reed Redevelopment:** The Commission supports the new policy focus area on the former Walter Reed Army Medical Center Site, which reflects a decade of progress to redevelop and reintegrate the site into the District. However, the proposed text under new item RCE-2.8, Former Walter Reed Army Medical Center Site, omits any mention of new housing and particularly the ability to provide and integrate new affordable housing, including deeply affordable housing, on the site. The Commission suggests the addition of a new bullet entitled “Policy RCE-2.8.7: Supporting the District’s Affordable Housing Goals,” with accompanying text that captures the importance of this site continuing to serve the District’s affordable housing goals.
 - **Support Safer, More Accessible Aspen Street:** The Commission continues to strongly support the reconstruction of Aspen Street at the southern boundary of the campus and appreciates the inclusion of Action RCE-2.8.C: Aspen Street. *See also* ANC 4B Resolution #4B-19-0406, “[Supporting Razing of Buildings 31 & 84 at the Parks at Walter Reed and Widening of Aspen Street, NW](#)” (Apr. 22, 2019).
2. The **Housing Element** describes the importance of housing to neighborhood quality and the importance of providing housing opportunities for all segments of the population throughout the city. The Commission generally supports proposed revisions to expand the supply of housing, particularly in areas with access to public transportation, but believes stronger language is required to ensure affordability and prevent

displacement. The Commission provides the following feedback on the Housing Element:

- **Define Affordable Housing to Include Deeply Affordable Housing:** The Commission appreciates additional proposed language regarding affordable housing within the Housing Element but believes that a clear definition of affordable housing is required and should include deeply affordable housing for low-income households earning less than 30 percent of the Median Family Income. *See, e.g.,* Callout Box: What is the Difference Between Housing Affordability and Affordable Housing? As it stands, references to “affordable housing” could mean little, if any, efforts to house extremely low- and very low-income households. The Commission also believes the District’s production targets for affordable housing should be tied to affordable housing needs and forecasts of needs, with a goal of eliminating households extremely burdened or burdened by housing costs. *See* Callout Box: What is the Difference Between Housing Affordability and Affordable Housing? (defining housing affordability); 504.7, Policy H-1.2.2: Production Targets (noting goal of production of approximately 29,000 units affordable based on breakdown in Figure 5.3, resulting in 11,600 units affordable to extremely low-income households); 516.4 (noting “[r]ising housing costs will continue to place more families at risk of homelessness”).
- **Provide Data Regarding Net Gain/Loss of Affordable Housing:** The Commission believes data regarding the net gain/loss of affordable housing is essential. Currently, one provision discusses the “approximately 1,700 affordable units delivered per year since 2016,” 500.15, while a separate provision notes that “expiring subsidies will place approximately 13,700 [affordable] units at risk,” 509.2.
- **Emphasize Using Every Tool Available to Ensure Affordable Housing:** The Commission believes that the Comprehensive Plan should emphasize that the affordable housing crisis requires the District to use every tool available to ensure affordable housing, with a goal of eliminating households extremely burdened or burdened by housing costs. In this regard, the Commission believes the Comprehensive Plan should recognize that the increased supply of housing – while important – will not alone solve the affordable housing crisis, particularly as related to extremely-low and very low-income households, and must be accompanied by active and robust City goals and policies to ensure affordability, including affordability for extremely low- and very low-income households, in relation to increased supply. *See, e.g.,* Callout Box: What is the Difference Between Housing Affordability and Affordable Housing? (emphasizing affordability as tied to supply); 500.7 (stating there is evidence that new production has slowed rising cost of renting or owning multi-

family units without citing or discussing evidence); 503.1 (recognizing expanded supply will not fulfill “all of Washington, DC’s housing needs at lower income levels”).

- **Better Define and Explain Inclusionary Zoning:** The Commission appreciates the value of inclusionary zoning, as well as Mayor Bowser and the Office of Planning’s proposal for Expanded Inclusionary Zoning, see Office of the Mayor, [“As Part of the #36000by2025 Goal, Mayor Bowser Announces Zoning Proposal to Create More Affordable Housing,”](#) as one of several tools to address affordable housing needs, particularly as related to economic integration. The Commission notes, however, that inclusionary zoning has historically resulted in a very modest number of affordable units that are affordable primarily at 80 percent Median Family Income, with only a small percentage of units at 60 percent Median Family Income. See Dep’t of Housing & Community Development, [FY2018 Inclusionary Zoning Annual Report](#) (Apr. 2019) (noting creation of 198 inclusionary zoning units in FY2018, 78 percent of which were for 80 percent MFI households, 4 percent of which were for 60 percent MFI households, and 18 percent were for 50 percent MFI households). While the Commission appreciates efforts to expand the program, the Commission feels strongly that the District must commit to other affordable housing tools, particularly those that create larger numbers of affordable units for extremely low- and very low-income households (such as public housing, social housing, and permanent supportive housing). The Commission also notes the current proposed language incorrectly states that inclusionary zoning requires most new residential developments of 10 units or more to set aside “upwards of 12.5 percent” of the project toward affordable units, when public sources cite 8–10 percent. 500.12.
- **Support and Expand Public Housing:** The Commission appreciates proposed language recognizing that public housing is a critical part of meeting the demand for affordable housing and preventing displacement. See 506.10. The Commission believes that public housing should remain publicly owned and permanently affordable. See ANC 4B Resolution #4B-19-1004, [“Calling on DC Housing Authority to Preserve Public Housing and Protect Public Housing Residents”](#) (Oct. 28, 2019); ANC 4B Resolution #4B-19-0506, [“Supporting Funding for Urgent Public Housing Repairs and Calling for Commitment to Maintain Public Housing Stock”](#) (May 20, 2019). The Commission also appreciates proposed language regarding build first and one-for-one replacement, see, e.g., Callout Box: Principles for the Redevelopment of Existing Affordable Housing, but the Commission believes it should be stronger. For example, the Commission believes not just in one-for-one replacement but rather the overall emphasis on the creation of additional public housing,

particularly on District-owned sites. *See, e.g.*, 503.8, Policy H-1.1.7: Large Sites; 504.11, Policy H-1.2.4: Housing Affordability on Publicly Owned Sites; 504.5. It is unwise to merely “study[] the need” for additional public housing, Action H-1.4.E: Additional Public Housing, particularly in light of the historic loss of public housing and the historic failure to include one-for-one replacement, *see, e.g.*, 509.3; 509.14, Action H-2.1.C: Purchase of Expiring Subsidized Housing and ‘Naturally Occurring’ Affordable Housing.

- **Discuss Social Housing as Affordable Housing Tool:** The Commission believes the Comprehensive Plan should include a discussion of social housing as a mechanism to address the affordable housing crisis. *See* Action H.1.1.D: Research new Ways to Expand Housing; Kriston Capps, “[Denser Housing Is gaining Traction on America’s East Coast](#),” *Citylab* (Jan. 3, 2020). *See also* ANC 4B Resolution #4B-19-1004, “[Calling on DC Housing Authority to Preserve Public Housing and Protect Public Housing Residents](#)” (Oct. 28, 2019).
- **Reintegrate Community Land Trusts as Affordable Housing Tool:** The Commission believes that the deletion of language in 504.24, Action H-1.2.G: Land Trusts, improperly removes an important affordable housing tool as completed when the City should continue to pursue community land trusts.
- **Accurately Reflect State of Rent Control:** The Commission believes the proposed language in the Comprehensive Plan inaccurately presents the current state of rent control in the District. For example, proposed language states that rent control is one program leading the District to have “one of the strongest sets of anti-displacement programs in the country.” Callout Box: What is Displacement? This statement fails to recognize the current state of the District’s rent control program, which has shrunk significantly with the loss of approximately 50,000 units since 1985. Proposed language in the Housing Element recognizes the substantial loss of affordable rental units as a whole but makes no mention of rent control as a mechanism to address this loss. *See e.g.*, 500.9; 508.2; 509.5, Policy H-2.1.1: Protecting Affordable Rental Housing. Discussion of and reporting regarding affordability and the loss of affordable rental units should also include a discussion regarding the shrinking stock of rent-controlled units. *See* 500.7 (“between 2006 and 2017 there were nearly 18,300 fewer [rental] units affordable to households earning equal to or less than 60 percent of the MFI”); 503.10, Action H-1.1.B: Annual Housing Reports and Monitoring Efforts. In addition, the language in the Comprehensive Plan regarding possible refinements to the District’s rent control program should recognize the loopholes and maintenance disincentives that exist under the current program and encourage the exploration of solutions. *See* 509.10, Policy H-2.1.6:

Rent Control. *See also* ANC 4B Resolution #4B-19-1005, “[Supporting Proposed Extension and Calling for Expansion and Improvement of Rent Control](#)” (Oct. 28, 2019).

- **Include Data on Individuals Who Died Without Homes:** The Commission believes housing is a human right and that housing solves homelessness. *See* ANC 4B Resolution 4B-19-0307, “[Supporting Funding in FY2020 Budget to Address Chronic Homelessness](#)” (Mar. 25, 2019). The Commission believes the Comprehensive Plan should include statistics regarding the number of individuals who have died homeless to convey the severity of the problem of homelessness and the need for change. The Commission supports the inclusion of Policy H-4.2.3: Increasing the Supportive Housing Supply, and additional language in 516.17, Action H-4.2.A: Homeward DC, but also believes the discussion of additional permanent supportive housing should address forecasted need. 516.4 (noting “[r]ising housing costs will continue to place more families at risk of homelessness”).
 - **Link Increased Density to Value Recapture:** The Commission believes the Housing Element, as well as the Land Use Element, should link any increased density in the Elements and/or the Future Land Use Map to affordable housing set-asides that capture a significant portion of the value provided through any re-zoning. *See, e.g.*, 504.14, Policy H-1.2.7: Density Bonuses for Affordable Housing (discussing zoning incentives where a developer proposes building a “substantial amount of affordable housing above and beyond any underlying requirement” without defining substantial or the level of affordability).
 - **Meet Needs of the LGBTQ Community:** The Commission strongly recommends adding language identifying the LGBTQ community as a “Specific Group” under H-4.3: Meeting the Needs of Specific Groups. The Commission recognizes the unique needs of the LGBTQ community and believes the Comprehensive Plan should outline specific housing strategies to address housing needs and homelessness in the LGBTQ community, including consideration of increased risk of homelessness, specific needs for supportive services, and discrimination.
3. The **Transportation Element** describes efforts to promote a safe and sustainable transportation network for both visitors and residents. The Commission supports strong and resilient public transit and transportation serving all our neighbors. The Commission provides the following feedback on the Transportation Element:
- **Reinforce the District’s Vision Zero Goals:** The Commission supports the inclusion of the District’s goal of zero fatalities and

serious injuries in its transportation network. See 400.2; Policy T-5.1.1: Autonomous Vehicles and Safety.

- **Avoid Dependence on Private Experimentation:** The Commission believes that the District can be a venue for private experimentation in transit connectivity, but that the language in the Transportation Element goes too far in integrating various private experimental mode shares. Upeaval and turnover in that sector – including both car sharing and dockless bike sharing – shows that unlike automobile and transit, these services are not reliable enough to be included in a long-term vision for the District. See 400.6; 403.5; Policy T-5.1.2: Shared-Use Autonomous Vehicles.
 - **Maximize Affordable Housing in Joint Development Around Metro Stations:** Like all other publicly-owned land, the Commission believes that publicly-owned land around Metro stations should have as an integral part of any development effort maximizing the availability of deeply affordable housing. See 403.11, Policy T-1.1.5: Joint Development.
 - **Prioritize Safety and Livability for District Residents:** While the Commission recognizes the need for the District as an employment hub to be accessible to commuters from surrounding areas, the emphasis in the Transportation Element should be clearly focused on providing safety and livability for the residents of the District. See 405.4.
 - **Require Better Sidewalks in Our Neighborhoods:** The Commission believes that to ensure accessibility for seniors, persons with disabilities, and families, a comprehensive network of sidewalks that meet high standards for accessibility should be part of all our neighborhoods. Language in the Transportation Element around sidewalks is too vague and should set high standards for sidewalks both in production and performance. See 410.2.
 - **Ensure Developers Share Burden of Development:** The Commission believes that both the Transportation and the Infrastructure Elements should commit to a goal of having large-scale development projects mitigate transportation and infrastructure impacts on surrounding communities. These efforts should include financial subsidies by developers to provide for stormwater impact mitigation and for increased transit service to ensure livability for existing neighborhoods.
4. The **Historic Preservation Element** guides planning for the protection, revitalization, and preservation of the District’s valuable historic assets. The Commission supports the preservation of our historic assets while

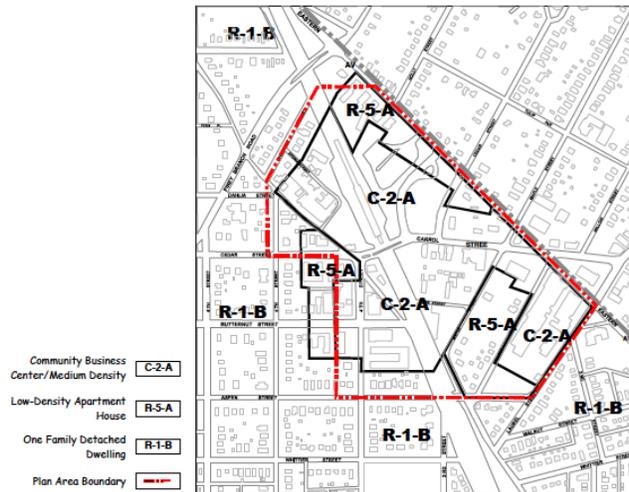
balancing the urgent need for affordable housing and action to mitigate climate change. In addition, the Commission supports efforts to provide grant assistance to all individuals residing in the Historic District, and not just homeowners. The Commission provides the following feedback on the Historic Preservation Element:

- **Encourage Consideration of Housing Affordability Within Historic Districts:** The Commission supports the addition of provisions recognizing the need to study “the relationship between gentrification, historic preservation, and the cost and availability of housing.” HP-4.1, Preservation and Economic Development. *See also* Policy HP-4.1.4: Historic Preservation and Housing; Action HP-4.1.C: Preservation and Housing Affordability.
 - **Recognize Solar Panels as Adaptive Use of Historic Properties:** The Commission appreciates language recognizing “[h]istoric properties were built for continued use, and a primary goal of preservation is to support the city’s vitality by adapting historic properties for modern needs,” 1000.12, and that “the District’s preservation law specifically encourages enhancement of historic properties and enhancing them for current use,” 1007, HP-2 Protecting and Enhancing Historic Properties. The Commission believes solar panel installations fall within such adaptive use and should be considered unobtrusive, minor alterations. *See, e.g.*, ANC 4B Resolution #4B-19-0903, [“Supporting Adoption of 21st Century Guidance for Installing Solar in Historic Districts”](#) (Sept. 23, 2019).
 - **Expand Grant Programs Beyond Homeowners:** The Commission appreciates the new language in Policy HP-4.1.6: Grant Programs and Tax Relief, but the Commission believes the suggested language should be expanded to include not just homeowners, but also condominiums and apartment buildings. *See also* Action HP-4.1.B: Historic Homeowner Grants; 1016.2, Policy HP-4.2.1: Preservation Incentives. Preferences for providing grants to homeowners fails to honor the diversity of our neighborhoods, which include apartments and condominiums.
5. The **Educational Facilities Element** addresses the location, planning, use, and design of the District’s educational facilities and campuses. The Commission believes in supporting community input on the planning of new schools and an emphasis on safe routes to schools. The Commission provides the following feedback on the Educational Facilities Element:
- **Plan Schools to Build Strong Neighborhoods:** The Education Facilities Element does not go far enough in recognizing the importance of community voice in planning new schools. Communities and Advisory Neighborhood Commissions should have a strong voice

in the siting and development of public and public charter schools. See 1202.2.

- **Maximize Student Safety and Accessibility:** The Education Facilities Element should prioritize student safety and accessibility. Right now, educational facilities cluster in available space, often without safe walking, biking or transit routes to school. New facilities should be evaluated partially on student safe access to school before being constructed. See Policy EDU-1.1.3: Co-Location of Charter and DCPS Schools.
6. The **Future Land Use Map** depicts public policy for future land uses across the city. The Commission seeks additional consideration of specific proposed changes to the Future Land Use Map:
- **Reject Future Land Use Map Amendment #2377:** This proposed amendment pertains to properties in Square 3359, and specifically to the southernmost portion of a block bounded between Willow Street, NW, to the west, Laurel Street, NW, to the east, and Aspen Street, NW, to the south. The proposed change seeks to upgrade the site from its current moderate density residential designation to “*a mixed use Low Density Commercial / Moderate Density Residential.*”
 - In recommending its approval, the Office of Planning states that this “*Proposed amendment is consistent with completed plans or policy documents.*” “[Proposed Amendments to the Maps of the Comprehensive Plan](#)” at 106 (Oct. 2019). This is incorrect.
 - This area was never previously envisioned for mixed-use commercial or retail uses. Rather, the Takoma Central District Plan targeted this area for multi-family residential, effectively serving as a transitional zone between mixed-use, medium density area to the north and single-family homes to the east and south. This is reflected in the “Preferred Zoning Concept” under the land use section of the Takoma Central District Plan (for example, see the Plan’s Figure F pasted below). “[Takoma Central District Plan](#)” at 26 (2002).

Figure F
Preferred Zoning Concept



TAKOMA CENTRAL DISTRICT PLAN / LAND USE

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- Neither the developer who currently owns this property (Douglas Development), nor the law firm that requested the amendment on their behalf (Holland & Knight LLP), have attempted to engage with the community as to the potential merits of the requested change.
- ANC 4B supports a designation for moderate density residential at this site, which its current RA-1 zoning allows. The Commission, however, disapproves of changing the intended use of this site via the Comprehensive Plan process, and urges further discussion with the community before any change allowing for mixed-use commercial or retail uses at this location.
- **Encourage Broader Consideration of and Emphasis on Affordable Housing and Transportation Management for Future Land Use Map Amendments #1708.1, #1708.2 and #84:** The Commission generally supports increased density around the Takoma Metro Station and other high-quality transit corridors, in part because individuals of all income levels should have access to robust public transit options. The Commission believes that any effort to increase density, particularly on publicly-owned land, should maximize affordable housing, including deeply affordable housing, including through affordable housing set-asides that capture a significant portion of the value provided through any re-zoning. In addition, the Commission believes that any development of these sites should require developer efforts to mitigate transportation and infrastructure impacts on surrounding communities, including mechanisms for stormwater impact mitigation and for increased transit service to ensure livability for existing neighborhoods.

RESOLVED:

- That Advisory Neighborhood Commission 4B calls on the Office of Planning to revise the proposed Comprehensive Plan in accordance with these recommendations. The Commission believes these recommendations are reflective of priorities we have consistently supported through Resolution, other Commission action, and the Commission's Annual Report: more affordable housing (especially deeply affordable housing) in our community, safe neighborhoods welcoming to diverse residents and visitors, strong and resilient public transit and transportation serving all our neighbors, and communities that preserve historic assets but are also able to adapt to the challenges of the future.
- That Advisory Neighborhood Commission 4B calls on the DC Council to incorporate any recommendations contained in this Resolution that the Office of Planning does not accept and to work with the Commission to identify legislative changes and funding sources to implement our Comprehensive Plan goals of a thriving, livable District of Columbia.

FURTHER RESOLVED:

That the Commission designates Commissioner Erin Palmer, ANC 4B02 to represent the Commission in all matters relating to this Resolution.

FURTHER RESOLVED:

That, in the event the designated representative Commissioner cannot carry out their representative duties for any reason, the Commission authorizes the Chair to designate another Commissioner to represent the Commission in all matter relating to this Resolution.

FURTHER RESOLVED:

That, consistent with DC Code § 1-309, only actions of the full Commission voting in a properly noticed public meeting have standing and carry great weight. The actions, positions, and opinions of individual commissioners, insofar as they may be contradictory to or otherwise inconsistent with the expressed position of the full Commission in a properly adopted resolution or letter, have no standing and cannot be considered as in any way associated with the Commission.

ADOPTED by voice vote at a regular public meeting (notice of which was properly given, and at which a quorum of eight of nine members was present) on January 27, 2020, by a vote of 7 yes, 1 no, 0 abstentions.