

District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 4C
P.O. Box 60847
Washington, DC 20039-0847

RE: Advisory Neighborhood Commission 4C Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Hilley, Nugent, Barry, Campbell, Simon, Matties, Varzi, Anderson, Coates, and Goodman:

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 4C, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan), such as changes to the Future Land Use Map.

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 4C 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 4C-1	2.14	61	FLUM	<p>ANC 4C takes note of the following:</p> <ul style="list-style-type: none"> The membership of Alpha Kappa Alpha Sorority, Inc. Xi Omega Chapter ("Xi Omega" or the "Chapter") owner of 4411 14th Street since 1981, wish to modify the land use designation of that 4400 block, which houses their headquarters and community service center building. Xi Omega applied to amend the Future Land Use Map designation for Square 2819 from Low Density Commercial to Mixed-use Moderate Density Commercial/Medium Density Residential to facilitate redevelopment of the Property into a mixed-use senior affordable housing and community service center project. The application was denied. <p>The DC Office of Planning approved Application #9942 for modification of the land use designation of the 4500 block of 14th Street (which is the block immediately north of the Xi Omega Property) from Low Density Commercial to Mixed-use Moderate Density Commercial and Moderate Density Residential.</p> <p>The elements of the Xi Omega Property, Square 2819 on the 4400 block of 14th Street NW are similar, if not exactly the same, as those of the 4500 block of 14th Street NW, which is situated directly north, and received land use designation modification approval. On that premise—in addition to the public benefits of the project to the community, and the project fulfilling multiple elements of an amended Comprehensive Plan—the Chapter requests ANC 4 to support their appeal for reconsideration of the decision to deny their application to amend the Future Land Use Map designation, in order to make the Project viable</p> <p>Therefore it is RESOLVED, that it would be in the community's best interest and the District as a whole for the property at 4411 14th Street NW to be redeveloped from an underutilized, antiquated, one story store front building, to an attractive, modern, mixed-use development with affordable senior housing and space for community service.</p>	01-Yes	The FLUM reflects this proposal.
ANC 4C-2	2.14	RCE-1.1.5 and RCE-1.1.6	Rock Creek East	In Response to Policy RCE-1.1.5: Housing Renovation and Policy RCE-1.1.6: Development of New Housing ANC 4C strongly encourages equitably distribute housing. Through the Comprehensive Plan, the District should fight against segregation, foster equitable access to opportunity, and comply with Affirmatively Furthering Fair Housing (AFFH) priorities. The District should require that every part of the city participate in adding housing to meet the need for all income levels. It is important to stress the importance of providing housing for low income residents; the median for affordable housing still does not provide for those at the lowest level of income in the city or those with government benefits.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The equitable distribution of housing is highlighted throughout the Housing Element, e.g. Policy H-1.2.3 Mixed Income Housing, Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas.
ANC 4C-3	2.14	RCE-1.2.9, RCE-1.2.A, RCE-1.2.B	Rock Creek East	In response to Policy RCE-1.2.9: Recreational Acreage and Action RCE-1.2-Action RCE-1.2.B: Historic Surveys Continue to conduct historic surveys in the Rock Creek East Planning Area; ANC 4C reiterates the need to improve data collection and transparency. The District should provide the highest quality public data. It should standardize housing-related data collection across agencies, and release all data and forecast analyses to the public, to facilitate transparency and regular reporting on the status and progress of housing-related programs. Data should include a comprehensive housing database and demand-based forecasts alongside existing supply-based (pipeline) forecasts. All data should include that which reflects affordable and subsidized housing.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; For additional information on housing data, see the Housing Element. Housing initiatives that fall outside the scope of the Comp Plan, are part of the continued analysis and efforts behind the Housing Framework for Equity and Growth and the Mayor's Housing Goals.
ANC 4C-4	2.14		Housing	ANC 4B passed Resolution #4B-20-0104 whereby they ask the Office of Planning to define affordable housing to include what they deem "Deeply Affordable Housing" as defined as such: 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.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Housing Element Table 5.1 and Figure 5.2 define and target extremely low income households at 30% of MFI .

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp Plan	OP Response
ANC 4C-5	2.14		Housing	ANC 4C echo's 4B's call to protect and provide housing for those whose income falls under 30 percent of the median family income. Whereas ANC 4C already requested and reiterates the need to include families. The District should be a city that houses people of all income levels and of all household sizes, including families. Through the Comprehensive Plan, the District should promote the creation and preservation of 3+ bedroom units along with other housing types.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Figure 5.3, H-2.1.B, H-4.2.3 target extremely low income households while H-1.3.1 ensures larger family size affordable units are supported.
ANC 4C-6	2.14		Housing	And to Prioritize affordable housing as a community benefit. When rezoning or granting significant zoning relief, the District should affirm through the Comprehensive Plan that affordable housing (in addition to any underlying requirement) is the highest priority benefit and that other community benefits should be long-lasting.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; H-1.2.1 defines affordable housing as major civic priority. E-1.1.1 Resilience to Climate Change is the only other policy described as a civic priority.
ANC 4C-7	2.14		Housing	And to Preserve existing affordable housing. When redevelopment occurs on properties with housing made affordable through subsidy, covenant, or rent control, the District, Zoning Commission, and neighborhoods should work with landowners to create redevelopment plans that preserve such units or replace any lost ones with similar units either on-site or nearby. These entities should provide the necessary density and/or potential funding to ensure it is financially feasible to reinvest in the property with no net loss of affordable units.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Narrative on Principles of Redeveloping of Existing Affordable Housing and Policy H-2.1.8 cover redevelopment of affordable housing.
ANC 4C-8	2.14		Housing	And to Protect tenants. Through the Comprehensive Plan, the District should ensure that when affordable housing is undergoing redevelopment, tenants have a relocation plan, are allowed to continue their tenancy with minimal disruption, and will have the right to return to their units or an equivalent replacement. Whenever feasible, redevelopment should observe build-first principles.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; Resolution supports Principles of Redeveloping of Existing Affordable Housing.