

District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 4D  
PO Box 60834  
Washington, DC 20039

RE: Advisory Neighborhood Commission 4D Comprehensive Plan Resolution

Dear Advisory Neighborhood Commissioners Bowser, Tabor, Polkey, Barden, Branton,  
and Nobil:

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 4D, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan). 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 4D 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 4D-1			001 - General Comp Plan Comments	Request for more time	01-Yes	The community public review process was extended for both the community and ANCs resulting in 88 days for the public and 123 days for ANCs. ANC input is being reviewed as great weight and forwarded to DC Council for great weight.
ANC 4D-2	1.15		001 - General Comp Plan Comments	Concerned that the established legal process for developing amendments to the Comprehensive Plan has not been followed	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The Office of Planning (OP) has gone above and beyond the requirements for an amendment to the Comprehensive Plan as outlined in DC Code §1-306.04 as well as expectations set from previous amendment processes. OP's commitment to community-based planning throughout the duration of the amendment process ultimately resulted in unprecedented engagement and feedback from the community. The process included standards for appropriateness in the Evaluation Framework published prior to Open Call in 2017, a format and deadline for submission of amendments, hundreds of public meetings held by the executive, the longest public review of proposed amendments in the history of modern DC planning, and ultimately an anticipated submission by the Mayor to Council. All of these items were adhered to as outlined in the DC Code.

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ANC 4D-3	1.15		001 - General Comp Plan Comments	In addition, the Comprehensive Plan process has not been followed with regard to reporting the progress and impact of implementing its provisions	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; A progress report on the implementation of the Comprehensive Plan is provided every off-amendment cycle. The last progress report was published in 2013, prior to the second and current amendment cycle. Additionally, the implementation of the actions in the Comprehensive Plan is tracked and aligned with the CIP each year through the capital budgeting process. Finally, agencies are held responsible for the implementation of their work plans, as guided by the Comp Plan, each year during their performance oversight hearings.
ANC 4D-4	1.15		Housing	ANC 4D urges OP to identify extremely low-income households and very low-income households as the households who suffer the most under DC's housing crisis and to focus programs on these income groups in order to provide safe, securing housing affordable to them to mitigate homelessness and the risk of homelessness	03-Acknowledged	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The Housing Element promotes housing affordability across all incomes and household sizes. Policies support affordable housing for extremely-, very-, and low-income households. For policies and actions directed towards extremely low-income households, please see Section H-2.1 Preservation of Affordable Housing and Section H-1.2 Ensuring Housing Affordability.
ANC 4D-5	1.15		Economic Development	Establish policies which use public funding to advance social, economic, and racial equity in DC and that mandate the enforcement of project impact assessment requirements that mandate detailed reports from relevant government agencies which are necessary for city planners and zoning officials to evaluate proposed project benefits and impacts, measure progress towards DC's affordable goals, mitigate rising housing costs, prevent displacement, and address other project effects in collaboration with the surrounding impacts communities and their identified social and developmental priorities. Prohibit public financing, incentives, zoning variances, or special exemptions for stadiums, entertainment centers, luxury apartments, condos, or hotels unless such funding substantially benefits homeless needs, first source law, long-term residents and businesses, public transportation, and economic, social, and racial equity in access to social services	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; This recommendation is beyond the scope of the Comprehensive Plan to require, as it is a high-level guide and not a mandate; however, not including the recommendation does not preclude a guide from being developed in the future.
ANC 4D-6	1.15		Rock Creek East	Investment in the youth of the Kennedy Street corridor. Investment to include establishing a multi-purpose, multi-generational recreation and job training in the skilled trades and entrepreneurship training and other services focused on youth	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; See the Economic Development and Educational Facilities Elements for additional information on economic and educational opportunities.

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ANC 4D-7	1.15		Housing	ANC 4D urges OP in policy H1.3.1 and 2.1.3 to establish a requirement that DC government will not fund or incentivize projects that will result in fewer housing units for larger households who require 3, 4, and 5-bedroom units following redevelopment and fewer units affordable to low income households who occupied the housing units prior to redevelopment.	04-No	Current language is sufficient and does not preclude regulatory action; Policy H-1.3.1 already addresses the retention of units that support families "The effort should focus both on affordability of the units and the unit and building design features that support families as well as the opportunity to locate near neighborhood amenities such as parks, transit, schools, retail and others.
ANC 4D-8	1.15		Housing	Reinstate the provision supporting the formation of community land trusts	04-No	Current language is sufficient and does not preclude regulatory action; Action H-1.2.G: Land Trusts has been completed and therefore is proposed to be deleted in the amended Plan.
ANC 4D-9	1.28	2377	FLUM	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. See Takoma Central District Plan	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Residential is also a permitted use under a commercial designation.
ANC 4D-10	1.15		Housing	Comprehensive Plan must commit to building majority of housing for households below 80% MFI. ANC 4D urges OP to be specific in continuing the Comp Plan commitment to the production of housing for the neediest households who are extremely low income at or below 30% MFI and those households who are very low income at or below 50% MFI first under policy H-1.2.1. ANC 4D urges OP to change the the targets in Figure 5.3 targeted Distribution of New Affordable Units by Income Group to require two-thirds of housing production in the next 15 years to households with incomes between 0% and 80% MFI	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The language in the Comprehensive Plan is consistent with adopted District policy. The Housing Framework for Equity and Growth Report includes more detailed information about the distribution of affordable housing across the District.
ANC 4D-11	1.15		Housing	Comp Plan must foster strengthening rent control. ANC 4D urges OP to require a strong commitment to strengthen rent control law to preserve and upgrade existing rent-controlled buildings and bring new buildings under rent control	04-No	Recommendation is beyond the scope of the Comprehensive Plan; H-2.1.6 supports rent control but expansion of rent control is beyond the scope of the Plan.
ANC 4D-12	1.15		Housing	Based on these realities, ANC 4D urges OP to include in the Housing Element a renewed commitment to preserving, upgrading, and building more public housing. OP should not eliminate the current Housing Element provision which calls for 1,000 additional units of public housing to be built; rather, because public housing serves poverty level households, OP should commit to strengthening public housing	04-No	Recommendation is sufficiently covered in another element/policy/action; The cited 1,000 units (1.4.E) is outdated from 2006. OP in coordination with sister agencies is conducting a demand study, which could identify more than 1,000 units.