

District of Columbia Office of Planning



Office of the Director

April 23, 2020

Advisory Neighborhood Commission 5B
1920 Irving Street NE
Washington DC 20018

RE: Advisory Neighborhood Commission 5B Comprehensive Plan Resolution

Dear Commissioners Higgins, Carley, Makembe, Amin, and Jones:

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 5B, marked as “Yes” were integrated into the Mayor’s Comprehensive Plan Update (Comp Plan). Such changes include updating language to be consistent with the Brookland Small Area 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 5B 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	OP Response
ANC 5B-1	2.13	2416	Upper Northeast	Significantly problematic from BNCA's perspective, the discussion of development around the Brookland Metro Station in UNE section 2416 has been changed to weaken the existing concepts and recommendations for integration of development near the Metro with the existing neighborhood. BNCA supports OP's edits to UNE section 2416 that now make a clear and explicit call to implement the recommendations of the Brookland/CUA Metro Station Small Area Plan (SAP). However, in that very same section, certain changes in language have been proposed by OP that are contrary to the recommendations of the SAP. For instance, at 2416.3, OP has changed the language regarding preserving existing low-scale residential uses "along and east of 10th Street NE," to simply "east of 13th Street NE" (emphasis added), thus moving the planning interface two blocks to the east (and skipping over Brookland's existing commercial "downtown" along 12th St.). This is contrary to the SAP, which provided at Recommendation 12: "Develop low-density residential along the west side of 10th Street between Otis Street and Newton Street; alternatively utilize this area as an expanded open space to transition to the lower scale residential area east of 10th Street." Brookland/CUA Metro Station SAP, Ex. Summary, at 15 (emphasis added). Thus, whether under a scenario of preserving the Brookland Green, or developing new housing, the SAP calls for integration with the existing neighborhood with sensitivity, starting at 10th Street NE.	01-Yes	The text was updated to reflect the proposed language, consistent with District policies.
ANC 5B-2	2.13		Economic Development	Neighborhood training/Workforce development training in real estate as part of any project approval.	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Economic Section Increasing Workforce Development Skills, and Action ED-4.2.L: Increase Access to On-The-Job Training and Workforce Development.
ANC 5B-3	2.13		Housing	Diverse housing (senior housing, market housing, workforce housing, affordable housing)	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Housing Element, Section H-1.1, Expanding Housing Supply.
ANC 5B-4	2.13		Rock Creek East	Increase green space at McMillan Park	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Rock Creek East Policy RCE-2.5.3: Resource Protection, Mid-City Policy MC-1.2.4: New Parks, and Policy MC-2.6.1: Open space on McMillan Reservoir Sand Filtration Site
ANC 5B-5	2.13		Upper Northeast	Allow for more connectivity to surrounding communities and streets (outward-facing development vs inward facing). Activate surrounding streets and sidewalks with development	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; For more information, see Policy UNE-1.2.1: Streetscape Improvements.
ANC 5B-6	2.13		Upper Northeast	Neighborhood serving small commercial (Coffee shop, laundromat, small deli, small diner, entrepreneurship/coworking) space	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; For more information, see Policy UNE-1.2.5: Increasing Economic Opportunity.
ANC 5B-7	2.13		Upper Northeast	More parking opportunities that come with new construction	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; See Action UNE-2.6.B: Parking Strategy, Policy UNE-2.6.4: Brookland's 12th Street Corridor, Action UNE-2.5.A: Rhode Island Avenue Station Area Planning, Policy UNE-2.6.1: Brookland/CUA Metro Station Area.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp	OP Response
ANC 5B-8	2.13		Upper Northeast	Preserve green space at the Brookland Metro Station by turning it into a park.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; UNE Area Element incorporates the Brookland Metro Small Area Plan which includes recommendations for Parks and Open Spaces.
ANC 5B-9	2.13		Upper Northeast	ANC 5B concurs with the BNCA Excerpts in reference to the Brookland Green stated below: <ul style="list-style-type: none"> • Continue to recognize Brookland as a stable residential and historic neighborhood that should be conserved in existing character • Preserve economic, racial, and cultural diversity and inclusiveness; • Maintain and preserve affordable housing for all age groups and family sizes; • Preserve and enhance accessible public green space; • Preserve and protect historic sites and properties; • Protect and preserve Brookland's environmental health including land, air, water, trees, urban habitats and climate; • Encourage revitalization of Brookland's commercial areas with a high priority on working with local businesses and contractors; • Assure a multiplicity of transportation/commuter options (e.g., walkable streets, safe and accessible bike trails, convenient bus and subway service, east/west connectivity), while reducing impacts from through-traffic and heavy trucks. 	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; The UNE Area Element incorporates the Brookland Metro / CUA Small Area Plan where many of these specific issues are discussed and recommended.
ANC 5B-10	2.13		Upper Northeast	Green space such as provided by the Brookland Green, and other institutional properties around Brookland, is important to the quality of life of all residents. Even small areas of green space afford opportunities for recreation and enjoyment of the natural environment that are otherwise difficult to access in a large urban core like DC. The tree canopy in such spaces is protected under DC's tree law and supports urban wildlife. Large trees and permeable lands provide stormwater management services that are important to DC's compliance with federal environmental laws and are intended to be protected and expanded under DC's environmental programs. The failure to provide for adequate park space and green space now not only could immediately negatively affect the community.	03-Acknowledged	Current language is sufficient and does not preclude regulatory action; UNE Area Element incorporates the Brookland Metro Small Area Plan which includes recommendations for Parks and Open Spaces.
ANC 5B-11	2.13	9997, 1775	Upper Northeast	With respect to the Brookland Green, OP's proposed FLUM change (Tracking No. 9997) is even more inexplicable. As we documented in our June 2017 proposal letter (with respect to proposal Tracking No.1775), this land, currently owned by WMATA, has already been recognized by WMATA as needing protection under an agreement reached with the City and neighborhood through the work of Councilmember Kenyan McDuffie. In a November 2013 Joint Development Solicitation (attached to our 2017 letter), WMATA specifically made clear that all proposals must preserve the Brookland Green. In a press release dated March 18,2014 (also attached to our 2017 letter),former Mayor Vincent Gray announced the District's plans to do a land swap with WMATA to preserve the Green.	03-Acknowledged	Recommendation is beyond the scope of the Comprehensive Plan; The FLUM is intended to be generalized and not a parcel-level scale. Not all existing Open Spaces are reflected at the approved scale of the map. Additionally, the proposed recommendations to the FLUM do not preclude open space, which may be achieved through WMATA's site-development at the parcel level.
ANC 5B-12	2.13		Housing	Family style rental housing for those who can't afford to own a home (single-family rental) but need more space than a 2 bedroom apartment	03-Acknowledged	Recommendation is sufficiently covered in another element/policy/action; See Housing Element Policy H-1.3.1: Housing for Larger Households.
ANC 5B-13	2.13		FLUM	We offer major observations below as well as several specific requests regarding changes we believe are imperative to make to the current draft. In particular, we strongly urge that the area known as the Brookland Green outside the Brookland Metro Station be designated as permanent park space on the Future Land Use Map (FLUM).	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; Amendment 9997 is consistent with Council approved Brookland Small Area Plan.

Resolution Number	Date Received	Citation/Tracking Number	Element	ANC Comment	Integrated into Comp	OP Response
ANC 5B-14	2.13		Land Use	Fewer trees in return for more workforce/affordable housing	04-No	Existing language is consistent with completed plans or policies/Proposed language is inconsistent with completed plans or policies; The planting of trees does not preclude or constrain the development of workforce housing.
ANC 5B-15	2.13		Upper Northeast	Act on the Councilman's pledge to create a city-owned park on 10th Street NE (between Otis & Newton). Consider a land swap between WMATA and the city in keeping with the Comprehensive Plan pledge to preserve and create public park space.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; UNE Area Element incorporates the Brookland Metro Small Area Plan which includes recommendations for Parks and Open Spaces. The Comp Plan is a high-level guiding document. Specifics around development and land swaps are under the purview of ZC.
ANC 5B-16	2.13		Upper Northeast	The city should require public park space be provided by developers seeking institutional parcel development at sites such as St. Joseph's Seminary, the Franciscan Monastery, and Howard Divinity.	04-No	Recommendation is beyond the scope of the Comprehensive Plan; The Comp Plan is intended as a high-level guiding document. Specifics around development and land swaps are under the purview of ZC.
ANC 5B-17	2.13		Transportation	Open site plans vs closed site plans. Pedestrian and vehicular connectivity, allowing individuals to go through sites as opposed to having to walk around.	04-No	Recommendation is sufficiently covered in another element/policy/action; The Urban Design Element includes policies and actions regarding the design of buildings that promote, open and engaging site plans such as Policy UD 3.2.1: Buildings that Enable Social Interaction, Policy UD 3.2.2: Recreational Space Design for Large Site Development, Policy UD-3.2.4: Safe and Active Streets Through Design, and Policy UD-4.2.2: Engaging Ground Floors.