



Advisory Neighborhood Commission 5E

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ANC 5E RESOLUTION No. 2020-001 FEEDBACK ON THE DRAFT COMPREHENSIVE PLAN

WHEREAS, the DC Comprehensive Plan seeks to establish a positive, long-term vision for the District, through the lens of its physical growth and change, and in so doing, addresses a variety of urban issues including land use, zoning impact, and budget, and seeks to ensure compatibility among 40 other planning documents; and

WHEREAS, the most recent DC Comprehensive Plan was adopted in 2006 and amended in 2011; and

WHEREAS, in consideration of the District's recent significant population growth and associated development, land use changes, and displacement of a significant number of longtime tenants and owners, it was determined in 2016 that the Comprehensive Plan was in need of additional amendment to reflect current and anticipated future challenges – especially related to housing, equity, resilience, community emergency preparedness, and public resources; and

WHEREAS, the amended DC Comprehensive Plan as currently proposed, includes: two maps (Future Land Use Map and Generalized Policy Map), three context elements (Framework, Introduction, Implementation), 12 City-wide elements (Land Use, Economic Development, Housing, Arts & Culture, Environmental Protection, Transportation, Community Services & Facilities, Educational Facilities, Urban Design, Historic Preservation, Infrastructure, Parks/Recreation/Open Space), and 10 Area Elements/Plans (Capitol Hill, Central Washington, Far Northeast & Southeast, Far Southeast & Southwest, Lower Anacostia & Near Southwest, Mid-City; Near Northwest, Rock Creek East, Rock Creek West, Upper Northeast); and

WHEREAS, neighborhoods represented by ANC 5E with detailed descriptions and recommendations in the Mid-City East Small Area Plan (MCESAP) are included in three (3) different Area Elements (Near Northwest, Upper Northeast, and Mid-City), but these Area Elements do not always fully present the land use, environmental, cultural histories, and social, economic, health, and educational needs of these neighborhoods and related recommendations (as did the MCESAP), thus necessitating additional scrutiny by ANC 5E and DC officials; and

WHEREAS, the amended DC Comprehensive Plan is to be approved by the DC Council in 2020, after undergoing two rounds of public review and comment – the second round of which is currently in process; and

WHEREAS, ANC 5E has longstanding interest in the Comprehensive Plan and its potential impact on the neighborhoods served by ANC 5E including Bates, Truxton Circle, Bloomingdale, Eckington, Edgewood, Hanover, and Stronghold; and

WHEREAS, consistent with such interest, ANC 5E and several of its individual Commissioners have: 1) attended numerous forums, sponsored by the City and community organizations, on the current amendment of the Comprehensive Plan and its potential positive and negative impacts; 2) submitted a May 5, 2018 Resolution entitled “The Comprehensive Plan and Affordable Housing”; 3) solicited comments from constituents; and 4) submitted comments during the first round of public review; and




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THEREFORE BE IT RESOLVED, ANC 5E approves and submits to the DC Office of Planning the attached comments and edits (Attachment A: General Comments and Attachment B: Text Amendments) on the draft Comprehensive Plan.

THIS RESOLUTION came before ANC 5E at a duly noticed and called meeting of the Commission held at The Summit at St. Martin's apartments on February 11, 2020. ANC 5E consists of ten (10) Commissioners, the presence of six (6) of which constitutes a quorum. With 9 members present, by a vote of 9 in favor, 0 opposed, and 0 abstentions, ANC 5E voted to adopt this resolution.

Respectfully Submitted,


Bradley A. Thomas, Chair, ANC 5E


Nick Cheolas, Corresponding Secretary, ANC 5E



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Attachment A General Comments

- Support the principles outlined in Draft Framework Element 220.5, superficially acknowledging the crisis of affordable housing and emphasizing (1) the preservation of existing affordable housing and (2) the production of new affordable housing in Ward 5. We further support, acknowledge, and emphasize the need for affordable renter-and owner-occupied housing production and the use of tools such as public housing, community land trusts, and limited equity cooperatives.
- The baseline density for the city should be moderate-density mixed-use; areas close to transit should be high-density mixed-use.
- Eliminate parking-minimum requirements, minimum lot size requirements, or setback requirements.
- Support the changes in how D.C.’s “established” neighborhoods should be “supported” instead of “protected.”
- Incorporate more language from HUD’s Affirmatively Furthering Fair Housing rule.
- Support more affordable and more dense housing in wealthy parts of the city, specifically Rock Creek West, Near Northwest, and Capitol Hill.
- Acknowledge the destructive history of restrictive covenants and housing discrimination in D.C.
- Commit to supporting more than just the three “centrally” located legacy arts districts mentioned in the draft Comp Plan Arts and Culture Element (the Downtown Arts District, the Uptown Arts District and the H Street NE Arts District).
- Acknowledge and support the important role parks play in recreation, aesthetics, health and wellness, neighborhood character, and environmental quality, and resilience.
- Integrate human support and resource services (e.g., social services, police, gov’t offices) as well as integral private retailers – such as grocery stores – into multi-use buildings proposed in the neighborhoods to address the basic needs of families and communities.
- Integrate green space, new neighborhood parks, and the planting of additional trees in strategic areas to mitigate environmental concerns and to impact traffic flow.
- Take a more general, less granular approach to amending the FLUM, with an eye toward converting and upzoning areas near commercial corridors and public transit to higher density, mixed uses. For example 2801 8th St. NE is designated Residential-Moderate Density/ Commercial-Low Density, while 2800 8th St. NE – directly across the street – is designated Production, Distribution, and Repair. Both of these properties will soon sit between two major, higher-density, mixed-use developments, and they are equidistant between two nearby metro stations.
- Support efforts to restore DC’s tree canopy and expand green infrastructure (see, e.g., 600.2, Policy E-1.1.2), particularly near the “heat islands” within Ward 5.
- Support the principles outlined in Draft Economic Development Element 700.3 regarding economic development, economic opportunities for all residents, and equitable economic growth.



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- Support proposed new action H-1.2.I: Leveraging Inclusionary Zoning.
- Support implementation of the themes outlined in the Draft Arts and Culture Element and the incorporation of the DC Cultural Plan (see, e.g., 1400.4). We also emphasize the following principles to guide implementation of both the Arts and Culture Element and DC Cultural Plan:
 - Support *artist driven* (rather than developer-driven) cultural spaces to provide jobs and space for artists and activate streets and neighborhoods.
 - Specifically recognize and support the work and investment of professional and full-time artists.
 - Extend the Draft Comp Plan's recognition and emphasis on avoiding displacement to consider the pervasive effects of displacement on DC's arts community, specifically the displacement of black artists.
 - Engage the arts community and artists *directly* when implementing the themes, actions, and policies outlined in the Arts and Culture Element and the Cultural Plan (for example, the loan programs outlined in the Cultural Plan are not well understood).
- Support previously approved and submitted Eckington Comp Plan amendments to include approved and rejected amendments.



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Attachment B Proposed Text Amendments

SUBMITTED BY	ELEMENT (e.g. “Land Use”, “Housing”, “Mid-City”, “Upper Northeast”, etc.)	POLICY SECTION # & TITLE (e.g. “Policy MC-1.1.1 - Neighborhood Conservation”. If proposing a new section, write “NEW”	CURRENT CONTENT WITH PROPOSED DELETIONS AND INSERTIONS	RATIONALE OR PROPOSED AMENDMENT – If necessary
ANC 5E07 Commissioner	Mid-City	NEW	<p>NEW SECTION</p> <p>The Mid-City Area Element includes the neighborhoods of Mount Pleasant, Lanier Heights, Adams Morgan, Columbia Heights, Shaw, Park View, Pleasant Plains, LeDroit Park, Bloomingdale, and Eckington. In 2014, the final Council-approved version of the Mid-City East Small Area Plan (MCESAP) was released. This plan was developed in response to the activism of residents and civic associations – which, along with the ANC, were highly engaged and involved in MCESAP’s development (see p. 4 of MCESAP). This Plan focused on the neighborhoods of Bates/Truxton Circle and Hanover (both in the Near Northwest Area Element), Sursum Corda (in the Central Washington Area Element), sections of Edgewood and Stronghold (both in the Upper Northeast Area Element), and Bloomingdale, Eckington, and LeDroit Park (all in the Mid-City Area Element).</p> <p>According to the MCESAP, these neighborhoods reflect a “political amalgam”, the boundaries of which “...were designed to encompass those neighborhoods situated around a contiguous portion of North Capitol Street that had yet to have an approved small area plan to guide land use and development, filling an important gap in planning for this part of the District of Columbia. Sursum Corda, while already addressed in the Northwest One Plan, was also included to address that community’s intent to redevelop their property while retaining</p>	

			<p>affordability.” The MCESAP authors conclude, “The many voices of Mid-City East community emerged to define a cohesive vision for the area: improve quality of life and enhance neighborhood amenities and character while supporting a community of culturally, economically and generationally diverse residents”.</p> <p>However, the reality that the MCESAP encompasses neighborhoods in four Area Elements might possibly result in inconsistencies/conflicts between MCESAP recommended policies and actions and those of the relevant Area Elements. <u>Consequently, in consideration of exceptional civic engagement/involvement of residents, civic associations, and ANCs in the development of MCESAP, and the breadth of detail in MCESAP, when such inconsistencies/conflicts are encountered, deference should be given to recommendations of MCESAP – except when it can be proven by city officials, developers and affected residents that the MCESAP recommendation(s) is outdated and now inappropriate.</u></p> <p>In addition, all Neighborhood Area Elements and other plans that incorporate MCESAP neighborhoods should be updated as soon as possible to include more information about those neighborhoods’ histories, characteristics, needs, and proposed improvements -- especially those noted in the MCESAP.</p>	
ANC 5E07 Commissioner	Mid-City	Policy MC-1.1.4 – Local Services & Small Businesses	<p>Protect the small businesses and essential local services that serve Mid-City. Encourage the establishment of new businesses that provide these services in areas where they are lacking, especially on the east side of the Planning Area <u>by establishing small businesses in demographically changing neighborhoods that are predominantly residential in character. This program would serve to incentivize and stabilize small businesses in residential neighborhoods by providing technical assistance with business operations, assistance with increases in rent or property tax, and incentives to engage in cooperative activities (e.g., joint purchasing of equipment, supplies and inventories; trash disposal and other contracts with neighboring businesses), and collaborative efforts(with neighborhood residents and organizations. There is an additional need to recognize through DCRA and ABRA regulations, the unique storage, garbage disposal, and traffic/parking challenges of small businesses (especially small restaurants with limited space) operating in rowhouse neighborhoods.</u></p>	

<p>ANC 5E07 Commissioner</p>	<p>Mid-City</p>	<p>Policy MC-1.1.8 – Traffic & Parking Management-</p>	<p>Improve traffic circulation along major Mid-city arterial streets, with a priority on 14th St., Georgia Avenue, U. Street, 18th St., Columbia Road, Connecticut Avenue, Florida Avenue, and North Capitol Street. Whenever possible, prior to the initiation of any proposed ‘dense’ development in these areas, develop detailed plans of programs to improve bus circulation, pedestrian & cyclist safety and ease of travel, and programs to mitigate the effects of increased traffic on nearby residential streets. Tax incentives might also be provided to nearby homeowners who improve their property through construction of a parking pad in their rear yards – thus improving safety on narrow neighborhood streets, and increasing the availability of on-street parking for those without rear yards and visitors.</p> <p>In consideration of the estimated additional 20,000 to 30,000 car trips per day associated with the development of the McMillan Sand Filtration site and the additional traffic impact of development of the Armed Services Retirement Home site, conduct a comprehensive North-South traffic study of North Capitol Street. (currently classified as “at failure” by DDOT -- especially south of Michigan Avenue), from Hawaii Avenue to New York Avenue and associated impacts on adjacent residential streets, including recommendations that serve to improve traffic flow and safety on North Capitol, and reduce traffic and reclaim neighboring streets for primary use by neighborhood residents.</p> <p>Promote business activity on North Capitol St. between R St. and New York Avenue by requiring all new construction of medium and high density mixed-use buildings that include commercial/non-residential space of at least 20,000 square feet to provide limited underground public parking. Consistent with the Transportation Element of the Comprehensive Plan... <i>[maintain remainder of this paragraph]</i></p>	
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ANC 5E07 Commissioner	Mid-City	Action MC - 2.7.A – North Capitol Revitalization Strategy	At end of existing language ADD: In consideration that nearly 45% of the recommendations of the approved Mid-City East Small Area Plan identify the ‘community’ as the responsible implementing or supporting party, the Office of Planning and other appropriate DC government Offices/Departments (e.g., DDOT) should be encouraged to develop a process for timely formal review and comment on planning and design reports prepared by voluntary neighborhood/civic/nonprofit groups to determine the reports’ consistency with the Comprehensive Plan and approved Small Area Plans. If determined to be consistent and feasible, such Offices/Departments (including the Office of Public-Private Partnerships) shall seek to encourage potential public-private partnerships and other mechanisms that could provide technical and funding resources for implementation of the reports’ recommendations.	
ANC 5E07 Commissioner	Mid-City	Action MC-2.7.2A	NEW ITEM As a means of maintaining, improving, and preserving the unique character of Mid-City while fostering civic engagement, resident diversity, apprentice training, and subsequent employment of Mid-City residents (especially those who are unemployed, homeless, returnees from incarceration, and/or young adults), District government shall encourage the establishment of Public/Private Partnerships that would provide materials and labor for exterior façade painting of homes owned by Mid-City elderly lower & moderate income residents. Extend this high impact and low-cost model to other Planning Areas. Identify other needs of DC’s special populations that might benefit from such an engagement/diversity/training/employment approach.	
ANC 5E07 Commissioner	Land Use	Policy LU-1/303: Shaping the city	New Item to be placed at end of LU-1/303: Supporting growth and assessing its sustainability and limits. The history of DC and other American cities demonstrate that a high rate of growth is not continuously sustainable. In the case of Washington, DC, current growth is associated with decreasing financing interest rates and unique demographic patterns. More than 200,000 black residents have left or been forced out of the City. Most of the City’s recent newcomers are overwhelmingly white, young adults (25 – 40 years of age), and more often than not, unmarried and/or without children. As this cohort ages, lifestyle changes are to be expected. In addition, supporting the current lifestyle of newcomers requires significant investments (e.g., multi-modal transportation, entertainment	

			<p>and ‘play’ venues, infrastructure, utilities enhancements, etc.) As these persons age, it is probable they will seek larger family-style housing and less intense social and residential environments. External factors such as changing economic and financing environments will also impact their lifestyle and City resources. The current rate of growth has resulted in increasing inequality and the need for District government to increase its investment in services and housing for its less advantaged residents.</p> <p>Consequently, there is a need to continually assess not only the means for supporting growth, but also the sustainability and limits of growth. For the latter, the objective is to avoid unsustainable growth and City revenue deficits. The past two years have been marked by a progressive decrease in the number of newcomers to our City. There is a need to <u>establish a matrix of indicators of the sustainability of growth</u> (such as number and status of child and elderly populations, quality of life, affordability, infrastructure needs and costs –new & in need of repair/replacement, population needs, roadway use & capacity, environmental impacts, quality of public education, changes in social/economic inequality, commercial and residential occupancy rates as well as average length of tenancy/occupancy (especially in mixed use development/districts), financing trends and rates for infrastructure and building construction loans, job creation rates, DC financial resources and surpluses/deficits, etc..). A report on the status of changes of such indicators should be issued no less frequently than every two years on the changing status of such indicators.</p>	
ANC 5E07 Commissioner	Land Use	Policy LU- 2.1.1/ 309.6: What makes a great Neighborhood	<p>Modify 2nd bullet to read: Easy access to shops and services meeting day-to-day needs, such as child care, groceries, and sit-down, buffet & carryout restaurants reflecting varying price points. In inclusive neighborhoods, shops & services collectively intentionally acknowledge the diversity of residents by reflecting their varying needs, cultural preferences, and economic means. Zoning and planning decision-makers should reflect this principle of diversity/inclusion in <u>ALL</u> of their deliberations and decisions.</p>	
ANC 5E07 Commissioner	Land Use	Policy LU – 2.2.4: Neighborhood Beautification	<p>Modify to read: Encourage the development of public-private partnerships for projects (especially those initiated by residents) which that improve the visual</p>	

			quality of the District’s neighborhoods, including landscaping and tree planting, facade improvement, anti-litter campaigns, graffiti removal, murals, improvement or removal of abandoned buildings, street and sidewalk repair, and park improvements, and public realm enhancement and activation. Whenever feasible, link such efforts to apprenticeship training programs for residents (especially those who are unemployed, homeless, returnees from incarceration, and/or young adults), of affected neighborhoods.	
ANC 5E07 Commissioner	Land Use	Policy LU-2.2.5: Enforcement of approval conditions	Modify to read: Fully enforce conditions of approval for new development, including design, building, and operating criteria. In the event, after approval, an applicant subsequently requests a significant change in design or use that previously had been reviewed and/or approved by an ANC, applicant will be required to return to that ANC to seek approval of proposed significant change in design, density, or use	
ANC 5E07 Commissioner	Land Use	Policy LU-2.1/309.4: A city of neighborhoods	<i>Modify to read:</i> During the coming decades, the District will keep striving for greater equity across all neighborhoods in terms of access to housing, job opportunities, economic mobility, energy innovation, and amenities increased stability in its transitional, emerging, and distressed neighborhoods. In regard to affordable housing, greater emphasis should initially be placed on creating such housing units in those neighborhoods currently <u>having lowest population density and/or lowest number/percentage of affordable units</u> (see Table 5.6 of Comp Plan). This does not mean that all neighborhoods should become the same [remainder of paragraph should remain as is.]	
ANC 5E07 Commissioner	Land Use	Policy LU-2.1.14/ 309.18a: Planned Unit Developments in Neighborhood Commercial Corridors	Modify to read: Planned Unit Developments (PUDs) in neighborhood commercial areas should provide high quality developments with active ground floor designs that provide for neighborhood diverse commercial uses, vibrant pedestrian spaces and public benefits including housing, affordable housing, and affordable commercial space, with exceptional attention given to multi-modal transportation, traffic and parking impacts.	
ANC 5E07 Commissioner	Land Use	Policy LU-2.2.6/ Public Stewardship	Support efforts by local Advisory Neighborhood Commissions, citizen/civic associations, garden clubs, homeowner groups, and other organizations to initiate neighborhood improvement and beautification programs. Provide information, guidance, and technical assistance and when possible access to public-private partnerships and other public	

			and private funding sources, to these groups as appropriate and feasible.	
ANC 5E07 Commissioner	Land Use	Policy LU-2.3.6/311.8: Places of Worship and other Religious Facilities	Modify to read: Recognize places of worship and other religious facilities as an ongoing, important part of the fabric of the city’s neighborhoods in a manner similar to that accorded small businesses . Work proactively with the faith-based community, residents, ANCs, and neighborhood groups to address issues associated with these institutions’ transportation, other parking needs , operations, viability , and expansion, ... [<i>maintain remainder of this paragraph</i>]	Churches in my SMD have progressively lost access to Sunday on-street parking due to increased Restricted Residential Parking. This has resulted in increased church non-attendance – especially by elderly & disabled members.
ANC 5E07 Commissioner	Land Use	LU-3.4/317: Group Housing	COMMENT All of the Land Use language related to Group Housing for Special Needs Populations has been deleted. Such housing, of which there are many in ANC 5E, are licensed facilities, often requiring zoning variances or adjustments, and typically operated by private entities contracted by the City, and inequitably distributed throughout the City. When such facilities are well-operated, they can be benefits to both the neighborhood and facility residents. But when they are poorly operated, they can be the source of concern for the neighborhood with unmedicated, self-medicated, unsupervised facility residents engaging in atypical and sometimes bizarre public behavior. <u>It is strongly recommended that the Comp Plan include language related to zoning, licensing, contracting, operation, and supervision of such facilities, and their expected contributions to strong inclusive neighborhoods.</u>	
ANC 5E07 Commissioner	Transportation	Action T-1.4.A/NEW: Develop a Placemaking in Public Space program	Develop a Placemaking in Public Space program within DDOT. DDOT should encourage and actively promote opportunities for enhancement in ineffective and under-used spaces citywide – especially in residential neighborhoods . Any enhancements within the public realm should prioritize safety and functionality of the space and carefully consider the impacts of the change to the space prior to any modifications being made. As a means of promoting the use of arts and streetscape in creating a sense of ‘place’, Developers of commercial/retail/non-residential space of more than 50,000 square feet or more, should be required to set-aside at least 1.0% of their	

			total construction budget for the building’s public art and beautification enhancements to be selected/designed in consultation with neighborhood residents. New construction of public buildings should also require such a set-aside.	
ANC 5E07 Commissioner	Housing	Action H-1.1.A/503.9: Rezoning of Marginal Commercial Land	AT THE END OF THIS PARAGRAPH, ADD THE FOLLOWING: In the case of scattered small commercially-zoned pockets of land <u>in predominantly residential neighborhoods</u>, efforts should be made <u>to ensure that any new mixed -use or residential development is not inconsistent in density or style with existing nearby homes or buildings</u> – especially in Historic Districts.	
ANC 5E07 Commissioner	Housing	Policy H-2.1.8/ New: Redevelopment of Affordable Housing/	As affordable housing reaches the end of its functional life, support the redevelopment of the site to the greatest extent feasible in line with the District’s goals and strategies regarding equity and inclusion. Redevelopment strategies should also always include consideration of the cost-effectiveness of major renovation of existing affordable housing and other buildings, including the addition of stories (i.e. increased density and height).	
ANC 5E07 Commissioner	Housing – H3	H-511.2: Home ownership and access	An important part of ownership is access to financing and real estate opportunity. In the past, the practice of “redlining” (e.g., withholding home loan funds in certain neighborhoods due to their social/ethnic/racial composition) made it more difficult to secure home loans in parts of the city. Enforcement of Fair Housing practices is important not only to stop unfair lending practices, but also to address affordable housing opportunities in high cost areas, discrimination against renters, single parents, persons with AIDS, and others with special needs. In this regard, consistent with <u>513 H-3.2 Housing Access</u>, the District should examine and clarify its policies and official actions that allow developers to construct a single building that functions as two buildings – one for market-rate units (predominantly white) and one for affordable senior housing units (in DC, typically predominantly black) – thereby promoting segregated housing in Washington, DC. For example, City officials should (in collaboration with HUD and fair housing officials), <u>develop principles that do not allow, or at a very minimum, mitigate, the significant negative social-cultural, cultural displacement, marginality, and non-inclusive impacts of separated senior housing (with separate entrances, lobbies, HVAC and other systems, and no access between the two building sections, etc.) in predominantly market-rate residential buildings.</u> Thus, public investment in housing should	

			<u>be a tool to remedy rather than promote segregation and inequality.</u>	
ANC 5E07 Commissioner	Housing	Policy H-04.141.2.7/504.140: Density Bonuses for Affordable Housing [e.g. PUDs]	Language in this section is very ambiguous. Please either DELETE, or CLARIFY and PROVIDE SPECIFICITY related to the following: <ul style="list-style-type: none"> • <u>...density bonuses for affordable housing units that are above and beyond any underlying requirement. [what are these underlying requirements?]</u> • <u>...flexibility in development standards should be considered to minimize impacts on contributing features and the character of the neighborhood. [What are 'development standards' & provide examples; how is such 'flexibility' related to 'contributing features and neighborhood character'?)]</u> 	
ANC 5E07 Commissioner	Housing	NEW Policy H-1.2.9 Advancing Diversity and Equity of Planning Areas	The current Comprehensive Plan is a 20-year document that expires in 2025. This policy includes affordable housing goals for 2050 (i.e., affordable housing should constitute 15% of housing in each Planning Area). <u>All goals in this policy and throughout the proposed Comprehensive Plan amendments should be limited to 2025, and the stated affordable housing goals for each Area Element should be revised accordingly.</u>	
ANC 5E07 Commissioner	Housing	NEW Action H-1.2. I: Leveraging Inclusionary Zoning	Consistent with the goals that one-third of all new housing be reserved for households at 30% - 80% AMI, Inclusionary Zoning affordable housing requirements should be increased to 15%- 20%, the banning of IZ in the downtown area should be revoked, and PUDs and other mechanisms associated with the granting of increased density over zoning limitations should require 25% to 30% affordable housing units.	
ANC 5E07 Commissioner	Housing	505.7 Policy H-1.3.2: Tenure Diversity and 504.16 Figure 5.23: Targeted Distribution of New Affordable Units by Income Group 504.16	Whereas , during the period of 2006 – 2017, the number of affordable units for persons at 60% or less AMI decreased from 82,400 to 69,000 units and consistent with its May 5, 2018 Resolution No. 2018-33 titled 'The DC Comprehensive Plan and Affordable Housing in the District of Columbia' , ANC 5E strongly supports affordable housing targets as noted in Figure 5.23: 40% for households below 30% AMI, 30% for household at 30% - 60% AMI, and 30% for households at 60% - 80% AMI. We also reiterate the need for no less than 25% - 30% of all affordable housing be reserved for families requiring 3 to 4 bedrooms.	
ANC 5E07 Commissioner	Housing	Action H-1.4.C/506.15: DCHA Improvements	At the end of this section, ADD: As an incentive to homeowners to accept housing vouchers for rental of basement and accessory apartments, etc. in those residential	

			neighborhoods with high cost rent or rapidly increasing rental rates, provide vouchers that are at least 10% higher in value than the median rentals for a unit of similar size and condition in the targeted neighborhoods.	
Cyrus Chimento, ANC 5E resident	Housing	New Item	<p>ADD THE FOLLOWING PROVISION RELATED TO AFFORDABLE HOUSING:</p> <p>Affordable housing in DC shall be "<u>invisible and integrated</u>": that is, below market units (a) should bear no evidence of such status exterior to the unit. and (b) should be distributed throughout the development. Separate lobbies for tenants or owners of the below market rate units should be disallowed.</p>	

<p>Robert Brannum, ANC 5E08 Commissioner</p>	<p>Resilience Crosswalk Overview for Implementation And Resilience Crosswalk Table for Implementation</p>		<p>The proposed crosswalk implementation table appears somewhat uneven in the details of its implementation actions across various plan elements and issues of concern. The following recommendations seek to provide guidance for related improvements:</p> <ul style="list-style-type: none"> • The Resilience Plan should include specific targets addressing community emergency preparedness outreach, planning, engagement and resilience in response to all natural and man-made disasters, and acts of domestic or foreign/international terrorism. • The Plan must incorporate goals, objectives and joint community-government emergency preparedness initiatives that protect, preserve, and strengthen the quality of life for all in the District of Columbia and the history and values (e.g., equity, inclusiveness, etc.) that undergird it. • The District of Columbia must develop and implement specific plans and actions that ensure information and outreach related to emergency security and preparedness are coordinated and granular – i.e., involve efforts that are conducted person-by-person, block-by-block, community -by -community, business by business, community institution by institution, etc. • The importance of community emergency preparedness as an essential element of planning for growth. 	
<p>Kirby Vining, ANC 5E09 Resident</p>	<p>Upper Northeast Area Element</p>	<p>2408.2 Policy UNE-1.1.1: Neighborhood Conservation</p>	<p>At the end of the first paragraph, ADD Stronghold and Edgewood.</p>	
<p>ANC 5E07 Commissioner</p>	<p>Upper Northeast Area Element</p>	<p>2408.16 Action UNE-1.1.C: Traffic Safety Improvements</p>	<p>. At the end of the first paragraph ADD North Capitol Street.</p>	
<p>ANC 5E07 Commissioner</p>	<p>Parks, Recreation & Open Space</p>	<p>2nd “New” following 807.3: Creating new parks in built-up neighborhoods</p>	<p>The increase in the District’s population means that there is a greater demand for commemorative parks under federal jurisdiction, such as Franklin Park, to serve a residential base.... Federal partnerships with local agencies and organizations, such as DPR, Business Improvement Districts (BIDs), and nonprofit groups are key to developing strategies that improve the character and function of these parks, provide new visitor amenities, and better support their neighborhoods while still protecting commemorative and historic resources within the parks. For example, planning for a deck-over park covering parts of the North</p>	

			<p>Capitol Street underpass (spearheaded by the Bloomingdale Civic Association), involves this approach, i.e., a) seeking partnerships with a private architectural firm, the North Capitol Main Street, the Federal Highway Administration, abutting civic associations, and appropriate DC agencies; b) the proposed deck-over park having commemorative uses (e.g., timeline neighborhood history plaques of abutting neighborhoods embedded in the park walkways and a possible statute of a resident of historical significance) while providing other amenities for children, adults, and families (e.g. splash park/amphitheater, streetcar cafe, Capitol vista; play green space, etc.).</p>	
ANC 5E07 Commissioner	Parks, Recreation & Open Space	808.3: Demand for recreational programs	<p>At the end of this section, ADD the following: On the east side of the Mid-City Element area, the only recreation center is the Harry Thomas, Sr. Center, which due to recent renovations has excellent fields, swimming pool and other outdoor facilities. However, the Center’s building is nearly unusable by the public. The Center needs to either be renovated and expanded, or razed with a new, larger, more functional facility built. In either case, landscaping should be greatly improved. (See Letter from ANC 5E to Mayor Bowser re: Request for Funding a New Harry Thomas Sr. Recreation Center, dated January 28, 2020). The need is to accommodate a variety of exercise and weight-lifting activities for varying ages, classrooms with computer facilities for health education and after-school and programs for seniors, community meeting rooms, and increased locker space.</p>	
ANC 5E07 Commissioner	Parks, Recreation & Open Space	815.8, Policy PROS-3.4.4: Trails in Underutilized Rights-Of-Way	<p>Develop multi-use trails in underutilized rights of way, including surplus railroad corridors and undeveloped street rights of way, and possibly alleys.</p>	
ANC 5E07 Commissioner	Parks, Recreation & Open Space	818.7/Policy PROS-4.2.5: Podium Parks	<p>Consider the development of ‘podium’ type open spaces and parks in the air rights over below-grade freeways and urban federal highways, including the I-395 Freeway through Downtown DC, and the Southeast-Southwest Freeway near Capitol Hill, and the underpasses of North Capitol Street.</p>	
ANC 5E07 Commissioner	FLUM	2108	<p>Location: - Between Hawaii Ave. North Capitol St. NE, and Rock Creek Church Rd. NW</p> <p>Currently zoned: “Parks and Public Space”. Recommended for “Moderate Density Zoning”.</p>	

			<p>It should be noted this proposed zoning change shall be contingent on completion of: a) comprehensive North-South traffic study of North Capitol St., and b) definitive determination of whether construction will or will not proceed at the McMillan Sand Filtration and Armed Services Retirement Home sites.</p>	
ANC 5E07 Commissioner	FLUM	9934	<p>Location: N St. NW, North Capitol St. NW, O St. NW, and Q St. NW. Currently zoned “Low Density Residential”. Recommended for <u>“Moderate Density Commercial”</u> (FAR 2.5 – 4.0: consistent with MU-5 – MU-7 zoning), and <u>“Medium Density Residential”</u> (FAR 1.8 -4.0: mid-rise apartment buildings and tall residential buildings surrounded by large areas of open space)</p> <p>The proposed residential area has a large number of residential homes, consistent with the neighborhood’s residential character. Consequently, any existing housing should be maintained, protected, and supported. Commercial, Residential, and Mixed-Use zoning should be no more than “Moderate Density”, with ‘Medium’ Density requiring award of a zoning variance or PUD application or other mechanisms associated with the granting of increased density over zoning limitations, and related resident comment.</p>	
ANC 5E07 Commissioner	FLUM	9941	<p>LOCATION: Western side of North Capitol St between Quincy Pl. NW and Florida Ave. NW</p> <p>Currently zoned ‘Low Density Commercial’ and “Moderate Density Residential’. Recommended for: <u>‘Moderate Density Commercial’</u> and <u>‘Medium Density Residential’</u></p> <p>In consideration of Historic District Designation, residential zoning should be limited to Moderate Density, with Medium Density requiring a zoning variance or PUD application or other mechanisms associated with the granting of increased density over zoning limitations, and related resident comment.</p>	
Betsy McDaniel, ANC 5E07 Resident	FLUM		<p>LOCATION: Square 3102 along North Capitol St. NW</p> <p>Proposed for upzoning;</p> <p>Any major change to the height and density of the church and the two-story rowhouses at 1714 -1722 North Capitol St. NW would have an extremely disruptive impact in general, and on that square in</p>	

			particular. The row is landlocked and proposed zoning upgrade will alter the quality of life for property owners who live there.	
Jennifer Ragins, ANC 5E05 Resident		Opportunity Zones	Opportunity Zone areas have been identified throughout Ward 5 neighborhoods: the Rhode Island Avenue (NE) corridor, Brentwood, Edgewood and perhaps even blocks. There is an urgent need for increased specific procedures for civic engagement and input related to Opportunity Zones.	
ANC 5E09 Commissioner & Kirby Vining, ANC 5E09 Resident – on behalf of the Committee Of 100	Planning & Development Priorities	All Area Elements	<u>Opposed to redlining of the PLANNING AND DEVELOPMENT PRIORITIES</u> - The Planning and Development Priorities sections have been deleted in all the Area Elements and should be restored (Sections 1507, 1607, 1707, 1807, 1907, 2007, 2107, 2207, 2307, and 2407). These were originally developed with extensive community consultation and for the most part remain as relevant today as when they were articulated. They are important expressions of planning direction. Without similar intensive area-by-area consultation they should not be removed. The engagement activities conducted by the Office of Planning as described in the amended Introduction are woefully inadequate to inform and gauge the land use concerns and goals of residents and businesses, and are a stark contrast to the intensive and meaningful consultation undertaken in preparing the current Comprehensive Plan.	
Kirby Vining, ANC 5E09 Resident – on behalf of the Committee Of 100	Land Use	300.2 301.3 304.2	Restore the first bullet: “Promoting neighborhood conservation”. Neighborhoods are the underpinning of the city’s success and their importance should be recognized and their character should be protected and enhanced. Restore the phrase “it [the Land Use Element], should be given greater weight than the other elements”. This is an important part of the balancing and the rest of the sentence doesn’t make any sense without it. Restore the important wording of this section. Growth should be accommodated in a way that “protects” (current plan) not “respects” (new language) the area’s historic character. The Plan for the City of Washington refers just to the L’Enfant Plan and does not include the McMillan Plan; both should be cited, as the current plan does. They should not be replaced by the more generic sounding, but more limited	

<p>Kirby Vining, ANC 5E09 Resident – on behalf of the Committee Of 100 (continued)</p>		<p>304.8</p> <p>305.13</p> <p>314.12</p>	<p>term—The Plan for the City of Washington—as the new language does. (see also Section 304.12) The Height Act is an important aspect of the core city and the reference to it should not be deleted. The “street and open space framework” reference has also been deleted and should be restored as an important part of the central city character.</p> <p>Again, here and elsewhere where it appears, the change to “respecting” historic resources from “protecting” is an inappropriate watering-down of historic preservation responsibilities. Use “protecting</p> <p>Two principles should be applied to waterfront sites—maximum access for all citizens to waterfront amenities and conservation of natural resources. Residential, commercial, and office use often prevent such access for all citizens and should be prohibited.</p> <p>Eliminate “promote” and reinstate “ensure” compatibility. Surrounding areas should be able to expect that steps will be taken to ensure compatibility of industrial-type public works facilities. What would it even mean to “promote” such compatibility?</p>	
<p>Kirby Vining, ANC 5E09 Resident – on behalf of the Committee Of 100</p>	<p>Housing</p>	<p>Section 504.14 Policy H-1.2.7- Density Bonuses for Affordable Housing</p>	<p>This section laudably supports the effort to increase affordable housing. However, the character of neighborhoods is an important aspect of the livability of Washington, DC. Respecting the character of neighborhoods should always be required in allowing density bonuses and is particularly important in historic districts. Therefore, the following sentence that has been marked for deletion should be restored: “Density bonuses should be granted in historic districts only where the effect of such increased density does not significantly undermine the character of the neighborhood.”</p>	
<p>Kirby Vining, ANC 5E09 Resident- on behalf of the Committee of 100</p>	<p>Environmental Protection</p>	<p>Section 623.7, Action E-1.1. – Development in Floodplains & Policy on n Floodplains.</p>	<p>Restore the opening phrase: “Restrict development within FEMA-designated floodplain areas...” and restore similar language in Section 624.7, Policy E-4.7.4 on Floodplains</p>	
<p>Kirby Vining, ANC 5E09 Resident</p>	<p>Infrastructure</p>	<p>Section 1311.1</p>	<p>At the end of the last new paragraph add: “In planning and implementing the new technologies [e.g. 5G cell], the District should minimize any adverse impacts on human health, streetscapes, and the</p>	

		Section 1312.1 Section 1312.1	environment.” Per pending litigation and decisions, after (FCC) in the first paragraph add: “They must also comply with all legal standards, such as environmental and historic preservation requirements.” After the end of the last new paragraph add: “However, there are areas in the city where residents and businesses may believe that they are already adequately served with digital and information technologies. In order to be as responsive as possible to communities, individual ANCs should be afforded the opportunity to opt out of 5G implementation by resolution.”	
Kirby Vining, ANC 5E09 Resident	Implementation	General Comment	Equity is intended to be a theme of this element. However, the element only mentions health and the environment. Jobs, transportation, education, and affordable housing are not mentioned. While there is an Equity Crosswalk Element, attention to equity needs to be significantly broadened in the Implementation Element narrative.	
Aaron Sessions, ANC 5E Resident	Mid-City	2003.1	COMMENT Unclear why the percentage of population is the same in 2000 and 2017 (14%)	
Aaron Sessions, ANC 5E Resident	Mid-City	2000.8	Some Mid-City neighborhoods still struggle with violent crime, homelessness, drug abuse, vagrancy, and blight. Despite the real estate boom, buildings continue to lie vacant along commercial corridors such as lower Georgia Avenue, Florida Avenue, and North Capitol Street. The area also has a severe shortage of parkland. As the densest part of the city, and one with many young children, recreational needs are among the highest in the city. Most of the area’s parks lack the land and amenities to meet these needs. **START ADD** Thoughtful redevelopment of the McMillan Sand Filtration Site can help meet the areas deficits of housing including its need for a grocery store, community center, recreational open space along with Senior Living plus a small percentage of new and affordable housing units to be developed by year 2025. **END ADD*	
Aaron Sessions, ANC 5E Resident	Mid-City	2016.9	COMMENT Keep sentence that was removed regarding viewsheds and vistas. See Texas Capitol View Corridors as a reference for view corridor planning.	
Karla M. Lewis,	Mid-City	MC-2.7.3	Policy: MC-2.7.3: Connecting Bloomingdale and Eckington Improve	

ANC 5E06 Commissioner			connectivity between Bloomingdale and Eckington by expanding the North Capitol overpass, decking over the entire expanse to create a tunnel between Seaton Place and Rhode Island Avenue and creating a green space to make crossing North Capitol Street more inviting for pedestrians and other persons using non-motor vehicles.	
Karla M. Lewis, ANC 5E06 Commissioner	Planning & Dev Priorities	2407	Opposed to redlining of the PLANNING AND DEVELOPMENT PRIORITIES - The Planning and Development Priorities sections have been deleted in all the Area Elements and should be restored (Sections 1507, 1607, 1707, 1807, 1907, 2007, 2107, 2207, 2307, and 2407). These were originally developed with extensive community consultation and for the most part remain as relevant today as when they were articulated. They are important expressions of planning direction. Without similar intensive area-by-area consultation they should not be removed. The engagement activities conducted by the Office of Planning as described in the amended Introduction are woefully inadequate to inform and gauge the land use concerns and goals of residents and businesses, and are a stark contrast to the intensive and meaningful consultation undertaken in preparing the current Comprehensive Plan.	
Scott Goss, ANC 5E05 Resident	Mid-City	MC-1.1.8:	Improve traffic circulation along major Mid-city arterial streets, with a priority on 14th St., Georgia Avenue, U. Street, 18th St., Columbia Road, Connecticut Avenue, North Capitol Street, New York Avenue NW, and Florida Ave NW . Whenever possible, prior to the initiation of any proposed ‘dense’ development in these areas, develop detailed plans of programs to improve bus circulation, pedestrian & cyclist safety and ease of travel, and programs to mitigate the effects of increased traffic on nearby residential streets.	
Scott Goss, ANC 5E05 Resident	Mid-City	MC-1.2.5	Neighborhood Greening: Undertake neighborhood greening and planting projects throughout the Mid-City Area, particularly on median strips , public triangles, and along sidewalk planting strips. 2009.5	
Scott Goss, ANC 5E05 Resident	Mid-City	MC-2	Comment: Specifically include the unit-100 blocks of New York Ave. NW in the MC-2 Policy Focus Area. Given the residential nature of the street, coupled with the heavy traffic bound for 395, that this corridor should receive the same attention as North Capitol street in terms of streetscape rehabilitation and traffic safety, minus the commercial aspect.	